

FILED

1 Dr. Veronica McCallup DSc  
2 In Pro per  
3 1042 N. Mountain Ave  
4 Upland, CA 91786  
5 504-405-6513  
6 vmccallup@yahoo.com

Local *5000 Hague Ave Tn C  
Williamsburg, VA  
U.S. DISTRICT COURT  
RICHMOND, VIRGINIA*

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Virginia  
Richmond Division

Case No. *3:20 cv 753*  
Jury Trial: Yes

9 The ESTATE of Jerry Theodore McCallup Jr.

10 Dr. Veronica McCallup DSc Administrator  
11 Plaintiff (s)

12 -V-

13 -ENVOY OF Williamsburg

14 And Affiliated Businesses

15 -Scarlett Huang (compliance officer)

16 -Brain L. Stevenson Jr

17 -ENVOY Corporate Offices

18 -City of Williamsburg Department of Human Services

19 -The State of Virginia Attorney General - Mark R. Herring

20 County Attorney for Williamsburg and James City County

21 -Adam Kinsman

22 -"Ciera"

23 -Brittany Moore

24 -Consulate Heath Care

25 -Sentara Health Care

26 -Jerry Theodore McCallup III

27 -Deborah Al-Jarboua

28 -Jeremy McCallup

29 Jeremy McCallup Wife

30 -Fahad Al-Jarboua

31 -Judge Williamsburg

32 - Deborah Al-Jarboua Mother

33 - Deborah Al-Jarboua Brother

1 -Wendy Evans Williamsburg department of Human services  
2 - United States Army Fort Bragg- NORMANDY DR. NORTH CAROLINA  
3 28310-0000

4 All Responsible Parties Jointly, Individually, In official  
5 capacity, Et, Al

6 I preserve my rights to add parties as they are discovered

7 Defendant(s)

8 **COMPLAINT FOR A CIVIL CASE**

9 Supreme Court found that pro se pleadings should be held to "less  
10 stringent standards" than those drafted by attorneys. pro se  
11 litigants' pleadings are not to be held to the same high  
12 standards of perfection as lawyers. Maty v. Grasselli Chemical  
13 Co., 303 U.S. 197 (1938) "Pleadings are intended to serve as a  
14 means of arriving at fair and just settlements of controversies  
15 between litigants. "Pleadings in this case are being filed by a  
16 Plaintiff in Propria Persona, wherein pleadings are to be  
17 considered without regard to technicalities. Propria, pleadings  
18 are not to be held to the same high standards of perfection as  
19 practicing lawyers. See Haines v. Kerner 92 Sct 594, also See  
20 Power 914 F2d 1459 (11thCir1990), also See Hulsey v. Ownes 63 F3d  
21 354 (5th Cir 1995). also See In Re: HALL v. BELLMON 935 F.2d 1106  
22 (10th Cir. 1991)."

23 **I. The Parties to This Complaint**

24 **A. The Plaintiff(s)**

25 1.

26 Name: Estate of Jerry Theodore McCallup Jr  
27 Street Address: 1042 North Mountain Ave  
28 City and County: Upland, CA 91786  
State and Zip Code: California 91786  
Telephone Number: 504-405-6513  
E-mail Address: vmccallup@yahoo.com

29 2.

30 Name: Dr. Veronica McCallup DSc Executor/Administrator  
31 Street Address: 1042 North Mountain Ave  
32 City and County: Upland, CA 91786  
33 State and Zip Code: California 91786  
34 Telephone Number: 504-405-6513  
35 E-mail Address: vmccallup@yahoo.com

36 3.

37 CTI, Inc/ CTI chemicals and Allied Products, Inc  
38 Street Address: 1042 North Mountain Ave  
39 City and County: Upland, CA 91786

1 State and Zip Code: California 91786  
2 Telephone Number: 504-405-6513  
3 E-mail Address: vmccallup@yahoo.com

4 **B. The Defendant(s)**

5 Provide the information below for each defendant named in the  
6 complaint, whether the defendant is an individual, a government  
7 agency, an organization, or a corporation. For an individual  
8 defendant, include the person's job or title (*if known*). Attach  
9 additional pages if needed.

10 4. Envoy of Williamsburg

11 1235 S. Mount Vernon Ave, Williamsburg, VA 23185 757-229-4121

12 5. Sentara Health Care

13 6015 Poplar Hall Dr, Norfolk, VA 23502

14 6. City of Williamsburg

15 Department of Human Services social services Division

16 401 Lafayette Street, Williamsburg, VA 23185-3617

17 7. Brian L. Stevenson Jr

18 1235 S. Mount Vernon Ave, Williamsburg, VA 23185 757-229-4121

19 8. Scarlett Huang (compliance officer)

20 1235 S. Mount Vernon Ave, Williamsburg, VA 23185 757-229-4121

21 9. The State of Virginia Attorney General - Mark R. Herring

22 202 North Ninth st, Richmond, VA 23219

23 10. County Attorney for Williamsburg and James City County

24 -Adam Kinsman

25 101 Mounts bay Rd building D, Williamsburg, VA 23185 757-253-6612

26 11. County of James city county

27 Commonwealth Attorney and Board of Supervisors

28 101 Mounts bay Rd building D, Williamsburg, VA 23185 757-253-6612

12. Consulate Health Care

800 Concourse Parkway, Maitland, FL 32751

13. Ciera

1235 S. Mount Vernon Ave

1 Williamsburg, VA 23185  
2 14. Britany Moore  
3 Department of Human Services social services Division  
4 401 Lafayette Street,  
5 Williamsburg, VA 23185-3617  
6 15. Envoy affiliate corporations  
7 16. Deborah Shelton Al-Jarboua c/o Britany Moore  
8 Department of Human Services social services Division  
9 401 Lafayette Street,  
10 Williamsburg, VA 23185-3617 LKA OCALA, FLORIDA  
11 17. Jeremy McCallup c/o Britany Moore  
12 Department of Human Services social services Division  
13 401 Lafayette Street,  
14 Williamsburg, VA 23185-3617  
15 18. Fahad Al-Jarboua c/o Britany Moore  
16 Department of Human Services social services Division  
17 401 Lafayette Street,  
18 Williamsburg, VA 23185-3617  
19 19. Jerry Theo McCallup III c/o Britany Moore  
20 Department of Human Services social services Division  
21 401 Lafayette Street,  
22 Williamsburg, VA 23185-3617 LKA COLORADO SPRINGS, CO  
23 20. Judge Williamsburg 5201 Monticello Ave Williamsburg, VA 23188  
24 21. United States Army Fort Bragg- NORMANDY DR. NORTH CAROLINA  
25 28310-0000  
26 22. The doctors in charge of care and doctors who cared for Mr.  
27 Jerry Theodore McCallup Jr.  
28 23. Police that took Mr. Jerry Theodore McCallup From his home.  
425 Armistead Ave. Williamsburg, VA 23185. Phone: (757) 220-2331.

1 24. Sheriffs James City County Government Center 101 Mounts Bay  
2 Road Williamsburg, VA 23185  
3 25. williamsburg Human services 401 Lafayette St Williamsburg VA  
4 23185-3617  
5 26. Wendy Evans 401 Lafayette St Williamsburg, VA 23185-3617  
6 27. Any and all insurance policies of plaintiff Jerry Theodore  
7 McCallup Jr  
8 28. Plaintiff reserve the right to add unknown parties  
9 29. Jeremy McCallup's Wife

10 COMPLAINT FOR CIVIL CASE

11

12 **COMES NOW**, The ESTATE OF JERRY THEODORE MCCALLUP JR, by and  
13 through Administrator, Power of Attorney, Medical Power of  
14 Attorney, Beneficiary, IN PRO PER, and brings the following  
15 action against defendants individually and jointly and in  
16 official Capacities and seeks answers and accountability and  
17 allege as follows:

18 I. That the State of Virginia with its corporations,  
19 employees, doctors, hospitals and agents; had to give the  
20 entire family, business liaison, and x-wives of Plaintiff  
21 Jerry Theodore McCallup JR notice prior to any and all  
22 court hearings, prior to any court actions,  
23 hospitalizations, adult protective service action, because  
24 they may have interest.

25 II. That Jerry Theodore McCallup Jr has always been a healthy man  
26 from a healthy athletic family and retired from the U.S. Military  
27 after 24-25 years on a regular retirement. He continued working  
28 as a civilian after the military retirement, until another  
retirement. He was an avid golfer and golf often. He even bought  
a home between two (2) golf courses. The McCallup's Great grand  
Father owned a Golf course in Arkansas.

1 III. Jerry Theodore McCallup Jr and sister started a business in  
2 1985 in Detroit Michigan called CTI, Inc and incorporated the  
3 business in Illinois as CTI Chemicals and Allied Products, Inc.  
4 until present and thereby, plaintiff asserts that the plaintiffs  
5 has alleged loss of support in this complaint, and can recover  
6 damages because the individuals named as the representatives of  
7 the estates can show reasonable expectation of receiving support  
from the decedents.

8 IV. Jerry Theodore McCallup Jr, was a resident of several states  
9 because of the military and business involvement. Jerry Theodore  
10 McCallup Jr was raised in Detroit, Michigan. On or about 2010  
11 Jerry Theodore McCallup Jr; witnessed by several attorneys and  
12 notary, made his sister Dr. Veronica Renee McCallup DSC, his  
13 Power of Attorney and His Medical Power of Attorney. In 1967  
14 Jerry Theodore McCallup Jr made Dr. Veronica McCallup DSC his  
15 Beneficiary and never changed it even after two (2) failed  
16 marriages; Dr. Veronica Renee McCallup DSC remained his  
17 Beneficiary on all his military records and property and assets.  
18 Dr. Veronica Renee McCallup DSC name is also on Jerry Theodore  
19 McCallup Jr Savings Bonds for over fifty (50) years. Jerry  
20 Theodore McCallup Jr and Dr. Veronica Renee McCallup DSC had  
remained close and business partners all their lives.

21 V. Dr. Veronica Renee McCallup DSC has went to several  
22 Universities and Married and raised family and lived in states  
23 with Jerry Theodore McCallup Jr and in states without Jerry  
24 Theodore McCallup Jr. Mr. Jerry Theodore McCallup Jr and Dr.  
25 Veronica Renee McCallup DSC grew up in the same humble home and  
slept in the same bed. She slept on his head.

26 VI. Plaintiffs believe that during between 2018-2019 Mr. Jerry  
27 Theodore McCallup Jr. continually requested and demanded the  
28 presence of Dr. Veronica Renee McCallup DSC while hospitalized  
and during court proceedings and until death. But defendants

1 refused his rights/ and his last rights, and blocked the presence  
2 of Dr. Veronica Renee McCallup DSc, so, that defendants could  
3 obtain property and moneys (as they did at plaintiffs fathers  
4 death, where Dr. Veronica McCallup DSc was also father's  
5 beneficiary). Mr. Jerry Theodore McCallup Jr uncle was  
6 Congressman John Conyers and if there was a court proceeding for  
7 adult protective services, he would have contacted his sister;  
8 Dr. Veronica Renee McCallup DSc, to contact counsel and or  
9 Congress in 2018-2019.

10 VII. Plaintiff Jerry Theodore McCallup Jr asserts a fourth  
11 amendment violation. Defendants couldn't begin legal proceeding  
12 for protective services with fabricate evidence by non-family and  
13 initiators. *Manuel v. City of Joliet, Ill.*, 137 S. Ct. 911, 915  
14 (2017). Fabricated evidence was the only evidence the judge  
15 relied on during the probable-cause hearing, that resulted in  
16 Plaintiffs Jerry Theodore McCallup Jr, being placed into adult  
17 protective service and the Judge failed to locate and identify  
18 Dr. Veronica Renee McCallup DSc who would have taken plaintiff  
19 Jerry Theodore McCallup Jr. out of/away from Virginia and to  
20 California or Michigan. But defendants didn't want that. They  
21 wanted the Plaintiff Jerry Theodore McCallup Jr where they could  
22 find his money. The Supreme Court granted certiorari deciding  
23 "whether an individual's Fourth Amendment right to be free from  
24 unreasonable seizure continues beyond legal process so as to  
25 allow a malicious prosecution claim based upon the Fourth  
26 Amendment." *Id.* at 924 (J. Alito dissenting) and it did.  
27 Defendants failed to give due process and notice to all Plaintiff  
28 Jerry Theodore McCallup Jr Family members and determine what  
options were available.

Justice Kagan's majority opinion answered affirmatively, over  
Justice Alito's dissent. The majority has two parts. First, the

1 majority held, "if the complaint is that a form of legal process  
2 resulted in pretrial detention unsupported by probable cause,  
3 then the right allegedly infringed lies in the Fourth  
4 Amendment." *Id.* at 919. The majority explained "legal process"  
5 covers any proceeding, including grand-jury indictment or  
6 preliminary examination, where the proceeding lacks probable  
7 cause because it's tainted by fabricated evidence.

8 The majority stated, "the contours and prerequisites of a §1983  
9 claim, including its rule of accrual, courts are to first look to  
10 common law torts" leading to the adoption of "wholesale the rules  
11 that would apply in a suit involving the most analogous tort."

12 VII. Plaintiffs are Native Indians and are federally protected  
13 and entitled to Religious rights. The American Indian Religious  
14 Freedom Act, Public Law No. 95-341, 92 Stat. 469, codified at 42  
15 U.S.C. § 1996, is a United States federal law. Plaintiffs were  
16 refused Religious rights, Religious diet, and sister to do  
17 religious last rights of passage or any Native tribe in the  
18 Virginia area. There are ten(10) Native tribes very close to  
Williamsburg Virginia.

19 VIII. Plaintiff Jerry Theodore McCallup Jr could have went to  
20 live with Dr. Veronica Renee McCallup DSC (in the pass they have  
21 lived together many times. Jerry Theodore McCallup Jr has even  
22 asked Dr. Veronica Renee McCallup DSC to allow his son Jerry  
Theodore McCallup III to live with her and she opened her door to  
23 this nephew). So caring for her only brother was normal. Treating  
24 her only brother at other medical facilities outside of Virginia  
25 was no problem. If Jerry Theodore McCallup Had a serious medical  
26 issue, defendants could have stabilized Jerry Theodore McCallup  
27 Jr and our cousin Jerome Morgan would have picked him up in a  
28 plane and flew him HOME or Dr. Veronica McCallup DSC could have  
had him air lift to a better medical facility within 1-2 (2018-

1 2019) years. Dr. McCallup DSC has friends with planes that would  
2 have flew him HOME at anytime. Dr. Veronica McCallup DSC or the  
3 Chief of Staff at Detroit Medical Center, Dr. Michael Wood MD,  
4 would have and could have personally came or helicopter Mr. Jerry  
5 Theodore McCallup Jr in, from any where, from Virginia to  
6 Michigan to Chicago to California; for medical care and better  
7 medical care with in one-two years.

8 IX. In This lawsuit discovery , facts are unravels like the  
9 Novel/Movie "MISERY". During a blizzard, Paul crashes his car  
10 (Plaintiff Jerry McCallup Jr will not allow defendant Jeremy  
11 McCallup to have his house) and is met by a cheerful loner named  
12 Annie Wilkes (Kathy Bates), (Defendants) who calls herself his  
13 "biggest fan" and sets about nursing him back to health. However,  
14 things take a turn once Annie discovers that Paul has killed off  
15 his character (plaintiff Jerry Theodore McCallup JR wanted to move  
16 back to illinois) Misery – and Paul (Plaintiff Jerry Theodore  
17 McCallup JR) discovers, in turn, that his caretaker (defendants)  
18 has a very dark past. Annie holds Paul hostage in her isolated  
19 home, forcing him to (take drugs/poisons to native Americans)  
20 write a new novel in which the heroine survives (causing  
21 Plaintiff to remain in virginia incapacitated). The iconic ankle-  
22 smashing scene arrives when Annie realizes that Paul is plotting  
23 an escape. After drugging him and strapping him to his bed, she  
24 calmly tells Paul about the practice of "hobbling," once used in  
25 African diamond mines on workers who tried to run off with the  
26 goods. As Paul begs for mercy, she wedges a piece of wood between  
27 his legs and picks up a sledgehammer, assuring Paul, "It's for  
28 the best." Then she brings down the hammer and breaks his ankles  
in two swift strokes. "God, I love you," she purrs as he writhes  
in agony.

1 X. Plaintiffs have learned that defendants Envoy of Williamsburg  
2 was in serious major medical violations and state violations and  
3 federal violations in 2018 – 2019. However, after being cited, no  
4 agency returned to recheck the violations prior to Jerry Theodore  
5 McCallup Jr wrongful death. Plaintiffs also learned that another  
6 person at the same facility died in the same month of Jerry  
7 Theodore McCallup Jr death.

8 XI. Plaintiff Jerry Theodore McCallup Jr is Native American and  
9 NOT an alcoholic and DOES NOT use medications. Defendant Deborah  
10 Al-Jarboua advised, suggested, prescribed, led others defendants  
11 to believe that Plaintiff Jerry Theodore McCallup Jr should be  
12 mal-treated and doped up. Plaintiff Jerry Theodore McCallup Jr  
13 didn't want that woman around him. Jerry Theodore McCallup Jr  
14 told Dr. Veronica Renee McCallup DSc, that defendant Deborah Al-  
15 Jarbuoa had put something in his food. Dr. Veronica Renee  
16 McCallup DSc began sending Jerry Theodore McCallup Jr. Native  
17 American treatments to cleans his system and blood and urine.

18 XII. Defendant Deborah Al-Jarboua became infuriated; when Jerry  
19 Theodore McCallup Jr didn't want her around and she caused the  
20 protective order to be instituted by and through defendants:  
21 Jeremy McCallup, Fahad Al-Jarboua and Britany Moore of the  
22 Williamsburg department of Human social services.

23 XIII. Plaintiff Dr. Veronica McCallup DSC was never contacted nor  
24 told of these actions. Dr. Veronica McCallup DSC wasn't told of  
25 her brothers' Death nor of the cremation to hide the poisons  
26 defendant Deborah Al-jarboau and defendant Envoy of Williamsburg  
doctors forced upon Jerry Theodore McCallup Jr. by and though  
Williamsburg department of social services and williamsburg  
police.

27 XIV. When Plaintiff Dr. Veronica McCallup DSC found out about  
28 Jerry Theodore MCCallup Jr death; it was on social media and  
texted to other people. Plaintiff Dr. Veronica McCallup DSC did

1 obtain some medical files that has conversations between  
2 defendants Deborah Al-Jarboua (and thereby, Fahad Al-jarboau) and  
3 Defendant Britany Moore (and defendant "Evans) of the county of  
4 James City and city Williamsburg. Defendants Deborah Al-Jarboua  
5 and defendant Britany Moore used the defendants Williamsburg  
6 police and Williamsburg sheriffs to force medications into  
plaintiff Jerry McCallup Jr.

7 XIII. Plaintiff Jerry Theodore McCallup Jr. was forced medicines  
8 but was able to make it home the first time.

9 XIV. Defendants came after him again to force him into Envoy of  
10 Williamsburg while they were in violation of Federal and State  
11 codes ordinances rules laws. After Plaintiff was kidnapped again  
12 and forced medication and other things and he told them  
13 (defendants: Jeremy McCallup, Britany Moore, "Evans", city of  
14 Williamsburg, James city, james city county, Fahad Al-Jarboua and  
15 Deborah Al-jarboua) that he wasn't taking ANY PHARMACEUTICALS.  
16 But they needed him dead. The goal was his death. They never  
17 located Plaintiff Dr. Veronica Mccallup DSC to see if she could  
18 make him take drugs/pharmaceutical or even to talk to Jerry  
19 Theodore McCallup Jr about his health if they were really  
concerned.

20 XV. The defendant Envoy of Williamsburg told plaintiff Dr.  
21 Veronica Renee McCallup DSc that "they" (defendants Fahad Al-  
22 Jarboua and Jeremy McCallup) was trying to get him to tell them  
23 where his money was. Defendants at Envoy of Williamsburg told  
24 plaintiff Dr. Veronica McCallup DSc on the phone, That; they knew  
25 he had more money and that even Envoy of williamsburg knew, he  
had other money; but none of the defendants were able to locate  
26 the money nor the insurance policies and bank accounts. Plaintiff  
27 Jerry Theodore McCallup Jr. had a vehicle that somebody has and  
28 Plaintiff Dr. Veronica Renee McCallup DSc stop payments on it.

XVI. Plaintiff Dr. Veronica Renee McCallup DSc attempted to reach

1 Fahad Al-Jarboua an army recruiter out of Fort Bragg N. Carolina  
2 by contacting military records in St. Louis who located defendant  
3 Fahad Al-Jarboua and gave him Plaintiffs Dr. Veronica Renee  
4 McCallup DSc phone number. Plaintiff Dr. Veronica Renee McCallup  
5 left the message that; "I just found out my brother has died I'm  
6 trying to obtain information about what happened". Defendant  
7 Fahad Al-Jarboua called plaintiff Dr. Veronica Renee McCallup DSC  
8 and said "you have the wrong number". The military, fort braggs  
9 located him, Plaintiff didn't. He was going to Defendant Envoy of  
10 Williamsburg pretending to be Jerry Theodore McCallup Jr son  
11 (Jerry the III) "in uniform" and thereby obtaining HIPPA PHI  
12 documents and information and passing that information to  
13 defendant Deborah Al-jarboua via phone text social media.  
14 XVII. Defendants, Envoy of williamsburg told Plaintiff Dr.  
15 Veronica Renee McCallup DSc on the phone, that defendant Fahah  
16 Al-jarboua was there, at defendants Envoy of Williamsburg,  
17 overseeing Plaintiff's Jerry Theodore McCallup, medical care and  
18 death with Envoy of Williamsburg treating doctors and medical  
19 staff often, in uniform, trying to get Plaintiff Jerry Theodore  
20 McCallup Jr to tell where the money was. Defendants never tried  
21 to obtain better medical care for Jerry Theodore McCallup Jr.  
22 They never tried to contact Dr. Veronica Renee McCallup Dsc in  
23 California nor Congressman John Conyers in Washington D.C. nor  
24 any Local Native Indian tribe. To locate the medicine man or the  
25 chief to give last rights or care. Defendant Jeremy McCallup Has  
26 "Native Indian", on his birth certificate and should know that  
27 Jerry Theodore McCallup Jr doesn't take medicines and thereby,  
28 defendants used the social services and cops to kill plaintiff  
Jerry Theodore McCallup Jr willfully and wantonly, and  
intentionally.  
XVIII. Plaintiff tried to file a wrongful death civil action in  
the Virginia state court and the Williamsburg judge rejected the

1 filings. The court wouldnot give the filing a case number. When  
2 Plaintiff asked, why, the Williamsburg judge clerk would say she  
3 didn't know. Plaintiff filed the case 4-5 times and the filing  
4 was rejected 4-5 times.

5 XIX. Plaintiff owned a 3,500 square foot house in Williamsburg 20  
6 years. Defendant Jeremy McCallup and Deborah Al-jarboua caused  
7 the home to go into foreclosure and Plaintiff to become ill.  
8 Plaintiff had an income of \$3,400.00-\$4,900.00 per month. The  
9 defendant Jeremy (who may have an autism) moved plaintiff Jerry  
10 Theodore McCallup Jr into motel 6 and sought to obtain \$1,500.00  
11 per month from Plaintiff income. After being in Motel 6 a while,  
12 Defendants Jeremy McCallup and Deborah Al-jarboua sought  
13 Defendant Britany Moore and the Williamsburg human services to  
14 place Plaintiff into Envoy of Williamsburg.

15 XX. Plaintiff intend to show that Jeremy McCallup and Deborah Al-  
16 Jarboua and Fahad Al-Jarboua co-conspired to drug Plaintiff Jerry  
17 Theodore McCallup Jr. until he was non-responsive and or  
18 incapacitated. And may have started the drugging in 2014 And then  
19 sought to obtain more money by obtaining human services via the  
20 city of Williamsburg, James city county who in turn took the  
21 opportunity to obtain money for it selves from the elder Jerry  
22 Theodore McCallup JR and abused the elder and denied the elder  
23 the best care and alternative care. Plaintiff intend to show that  
24 Defendant Jeremy McCallup is incapable of handling a life and  
25 that defendants knew it. That defendant Deborah Al-Jarboua and  
26 Fahad Al-Jarboua are the brains behind any treatments and actions  
27 to Plaintiff Jerry Theodore McCallup JR. They never located Jerry  
28 Theodore McCallup JR older son Jerry III to determine if he was  
fit or a candidate to monitor care. These are All  
responsibilities of social service/Human services of Williamsburg  
and wendy evans and britany moore. Jeremy McCallup is not  
mentally stable, he has sometype of slowness and may have cause

1 plaintiff Sickness and onset of Illness by abuse. Plaintiffs are  
2 in discovery.

3

#### **Basis for Jurisdiction**

4

- 5 • The defendant is from another state or another country,  
Diversity of citizenship
- 6 • The defendant is a large corporation that is being accused of  
violating certain federal laws, Federal question.

7 Under 28 U.S.C. § 1331, a case arising under the United States  
8 Constitution or federal laws or treaties is a federal question  
case.

9 Under 28 U.S.C. § 1332, a case in which a citizen of one State  
sues a citizen of another State or nation and the amount at stake  
10 is more than \$75,000 is a diversity of citizenship case.

11

#### **A. If the Basis for Jurisdiction Is a Federal Question**

12 List the specific federal statutes, federal treaties, and/or  
13 provisions of the United States Constitution that Fill out the  
paragraphs in this section that apply to this case.

14

1. Wrongful death suit against a police officer for violating  
loved one's civil rights.

15

2. Suing a larger corporation for violating specific federal  
laws.

17

3. Suing a defendant from another state or another country.

18

#### **4.42 U.S.C. 1983**

19 5. VIOLATION OF FIRST AMENDMENT RIGHTS DENIED ACCESS TO THE COURT  
BY VIRGINIA STATE COURT

21

6. Title 18, U.S.C., Section 242 - Deprivation of Rights Under  
Color of Law

22

7. Title 18, U.S.C., Section 241 - Conspiracy against Rights

23

8. 18 USC 242: Deprivation of rights under color of law

24

9. HIPPA VIOLATIONS Impermissible disclosures of protected health  
information (PHI)

26

10. Fourth Amendment Violation

27

11. RICO 18 U.S.C. 1962

28

1 12. Violation of ELDER ABUSE 42 U.S. Code § 3058i - Prevention of  
2 elder abuse neglect, and exploitation

3 13. Jerry Theodore McCallup Jr should have been in a different  
4 hospital and or medical facility. Jerry Theodore McCallup Jr has  
5 a son Jerry Theodore McCallup III was was never contacted nor  
6 give notice of any court proceeding, nor asked if he could be  
7 responsible for his dads care in The State of Colorado. Jerry  
8 Theodore McCallup Jr has a sister that's a doctor and she is not  
9 asked if she could care for her brother before Jeremy Mccallup  
10 and Deborah Al-Jarboua pulls the pulg on Mr. Jerry Theodore  
11 McCallup Jr and kills him, per the human services records.

12 14. If Mr. Jerry Theodore McCallup Jr wasn't placed under  
13 protective custody in the first place he would be alive. If  
14 defendants had checked the identity of defendants they would have  
15 determined they were not family. If defendants had properly  
16 notified all family and bills debtors friends business for court  
17 hearings, defendants would have learned that Plaintiff Dr.  
18 Veronica McCallup DSc is Plaintiff Jerry Theodore McCallup JR.'s  
19 power of Attorney and no action could be initiated without his  
20 power of attorney. Im sure he requested "his sister".

21 15. Mr. Jerry Theodore McCallup Jr had properties in several  
22 states and an income of \$3,900.00-\$4,900.00 per month. That  
23 defendants took and caused the loss of his house and the loss of  
24 his apartment and caused him to live in a motel 6. Defendants  
25 were stealing his money and administering medications  
contraindicating to Plaintiffs; diet, health and religious  
beliefs.

26 27 16. The defendants **ABUSED AN ELDER** Jerry Theodore McCallup Jr

28 **B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1      **1. The Plaintiff(s)**

2      a. If the plaintiff is an individual

3      The plaintiff, Estate of Jerry Theodore McCallup Jr, is a citizen  
4      of the State of New Mexico.

5      b. If the plaintiff is a corporation

6      The plaintiff, CTI Chemicals and Allied Products, Inc, is  
7      incorporated under the laws of the State of ILLINIOS,  
8      and has its principal place of business in the State of  
9      California.

10     c. Dr. Veronica McCallup DSc 1042 N. Mountain Ave, Upland , CA  
11     91786

12     **2. The Defendant(s)**

13     a. If the defendant is an individual

14     The defendant, Britany Moore, is a citizen of  
15     the State of Virginia .

16     b. If the defendant is a corporation

17     The defendant, ENVOY of Williamsburg, is incorporated under  
18     the laws of the State of FLORIDA , and has its  
19     principal place of business in the State of FLORIDA .  
20     Or is incorporated under the laws of Florida, New York,  
21     and has its principal place of business in VIRGINIA,FLORIDA, NEW  
22     YORK .

23     **3. The Amount in Controversy 80.1 Million dollars and burial  
24     expenses and travel**

25     The amount in controversy-the amount the plaintiff claims the  
26     defendant owes or the amount at stake-is more than \$75,000, not  
27     counting interest and costs of court, because (explain):80.1  
28     million dollars. See attached claims.

29     **III. Statement of Claim**

30     A. Write a short and plain statement of the claim. Do not make  
31     legal arguments.

32     1. Virginia is NOT Plaintiff's Home.

33     2. Jeremy McCallup, Deborah Al-Jarboua and Fahad Al-Jarboua are  
34     NOT persons that can; initiate, control Plaintiff Jerry Theodore  
35     McCallup Jr; money, decisions, property, legal actions, Health  
36     care.

37     3. The incapacitation of Plaintiff Jerry Theodore McCallup Jr was  
38     caused by poisons/drugs given to plaintiff Jerry Theodore  
39     McCallup Jr. at his house/home prior to : Jeremy McCallup,  
40     Deborah Al-Jarboua and Fahad Al-Jarboua seeking the other  
41     defendants involvements.

1 B. State as briefly as possible the facts showing that each  
2 plaintiff is entitled to the damages or other relief sought.  
3 Plaintiff Dr. Veronica McCallup DSc is the Estate administrator  
4 and Executor in 4 states and has accrued cost traveling, piecing  
the estate together. Dr Veronica McCallup DSc was in a business  
5 partnership with Plaintiff Jerry Theodore McCallup Jr and his  
death cuts Half or more of the business ventures. He handled all  
6 the military ventures. The denial of rights to notice and burial  
and care and last rights and survivor rights allows Plaintiff Dr.  
7 Veronica McCallup DSc damages and benefits as stated in military  
records and insurances.

8 C. State how each defendant was involved and what each defendant  
9 did that caused the plaintiff harm or violated the plaintiff's  
10 rights, including the dates and places of that involvement or  
conduct.

11 If more than one claim is asserted, number each claim and write a  
12 short and plain statement of each claim in a separate paragraph.  
13 Attach additional pages if needed

**CLAIM I VIOLATION OF FIRST AMENDMENT RIGHTS DENIED ACCESS TO THE  
COURT BY VIRGINIA STATE COURT DEMAND \$3,000,000.00**

15 Defendants: Judge of Williamsburg, Brittany Moore, Deborah Al-  
16 Jarboua, Jeremy McCallup, Jeremy McCallup Wife, Fahad Al-Jarboua,  
17 Williamsburg Department of Human Services social services  
18 Division, Wendy Evans Williamsburg human services, County of  
19 James city county, Brain L. Stevenson Jr , State of Virginia

20 1. Plaintiffs reaffirm all said herein and state that: on or  
about 2018-2020 plaintiff attempted to file a civil law suit  
21 with the City of Williamsburg county of James City County  
and the courts refused plaintiff Dr. Veronica McCallup DSc  
22 access to the court by returning all civil claim documents  
petitions law suits cover letters and request.  
23 2. Plaintiffs attempted to re-file the lawsuit modifying the  
claim and documents several times 4-5 times between 2019 and  
24 2020.  
25 3. Plaintiff verbally ask the defendants City of Williamsburg  
26 James city county, "why will you NOT file my law suit?".  
"why you will not place a case number on the filing ?" The  
27 defendants City of Williamsburg James City county seem to be  
covering up something or preventing and record of the  
28 wrongful death lawsuit of plaintiff Jerry Theodore McCallup  
JR.

- 1       4. Plaintiff learned that there had been another wrongful death
- 2       civil lawsuit filed against the same defendants 2019 and
- 3       that case seem to have disappeared from the court dockets.
- 4       There was the filing then no action, no motions, no
- 5       settlements, no negotiations no court dates for over 6
- 6       month.
- 7       5. Plaintiff also learned that the defendants city of
- 8       Williamsburg James city county Judge of Williamsburg has one
- 9       Judge that does what he wants to do and was also the Judge
- 10      that violated Plaintiff first, fourth and fourteenth
- 11      amendment right of access to the court and due process right
- 12      of notice and right to appear and be heard. The judge was
- 13      the Judge that placed plaintiff under protective service
- 14      under which he died and where other wrongful death suits
- 15      plaintiffs are dying (RICO CLAIM). And The defendant Judge
- 16      of Williamsburg made his judgment on false information,
- 17      tainted information, with/and given by; defendants: Brittany
- 18      Moore, Jeremy McCallup, Fahad Al-Jarboua, Deborah Al-
- 19      Jarboua, Wendy Evans, City of Williamsburg Human Services
- 20      and Envoy of Williamsburg and defendant Brian Stevenson Jr.
- 21      who knew Envoy of Williamsburg was not in compliance and
- 22      should not have taken any more clients until compliance was
- 23      achieved. BUT defendant Haung is not/was not capable of
- 24      accomplishing compliance with the MANY violation of state
- 25      and federal laws defendant Envoy of Williamsburg was
- 26      sanctioned for July 2018- September 2019 when it was shut
- 27      down/closed down.
- 28      6. The defendant Judge of Williamsburg should have been aware
- 1       of the unlawful violations of state and federal law by
- 2       defendant Envoy of Williamsburg, before placing plaintiff in
- 3       their hands (Envoy of Williamsburg) 2018. Defendant Judge of
- 4       Williamsburg definitely knew about the violations when
- 5       Plaintiff filed my law suits 4-5 times and the filings were
- 6       rejected with no reason, no case number. Plaintiff couldn't
- 7       appeal the decision because the defendant pretended that the
- 8       filing and the plaintiffs injuries never happened. Denying
- 9       plaintiffs the right to appeal.
- 10      7. Wherefore, causing plaintiffs damages, grief, undue
- 11      stressors, emotional distress, fees, fines sabotaging
- 12      plaintiffs statue of limitations, obstructing Justice. And
- 13      plaintiff is entitled to damages demanded herein of
- 14      \$3,000,000.00 PLUS Punitive damages and the courts have held
- 15      that pro per litigants can receive attorney type fees for
- 16      litigations/working, just like in probate matters; the
- 17      administrator is paid for all hours worked on the
- 18      estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's
- 19      Jerry Theodore McCallup JR Beneficiary and Power of attorney

1 and medical Power of Attorney documented with the military  
2 and other courts in other states including Virginia. No  
3 court, no hospital, NO action concerning Plaintiff Jerry  
4 Theodore McCallup JR. can proceed without Plaintiff Dr.  
5 Veronica McCallup DSc.

6 Footnote: 42 U.S.C. § 1983 (1976) provides: Every person who,  
7 under color of any statute, ordinance, regulation, custom, or  
8 usage, of any State or Territory, subjects, or causes to be  
9 subjected, any citizen of the United States or any other person  
10 within the jurisdiction thereof to the deprivation of any  
11 rights, privileges, or immunities secured by the Constitution  
12 and laws, shall be liable to the party injured in an action at  
13 law, suit in equity, or other proper proceeding for redress. 3.  
14 403 U.S. 388 (1971) (violation of fourth amendment). 4. In  
15 Davis v. Passman, 99 S. Ct. 2264 (1979), the Court extended  
16 Bivens beyond the fourth amendment by implying a cause of  
17 action and a damages remedy under the equal protection  
18 component of the due process clause of the fifth amendment. 5.  
19 Throughout this Article the terms "Bivens litigation" and  
20 "Bivens action" will be used interchangeably to describe a  
21 private action against a federal official to redress a  
22 constitutional violation. The word "Bivens" will be used to  
23 describe the case itself. 6. In 1960, 280 lawsuits were filed  
24 under § 1983. The annual total increased to 3,985 by 1970 and  
25 to 12,313 in 1977. Newman, Suing the Lawbreakers: Proposals to  
26 Strengthen the Section 1983 Damage Remedy for Law Enforcers'  
27 Misconduct, 87 YALE L.J. 447, 452 (1978)

28 **CLAIM II 42 USC.1983 42 U.S. Code 1983 state actor uses the**  
**legal system to deprive plaintiffs of their constitutional**  
**rights. DEMAND: \$3,000,000.00**

29 Defendants: Williamsburg Department of Human Services social  
30 services Division , Scarlett Huang (compliance officer) Envoy of  
31 Williamsburg, Wendy Evans Williamsburg human services, Brittany  
32 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
33 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, Jeremy  
34 Mccallup Wife, Fahad Al-Jarboua , County of James city county,  
35 Brain L. Stevenson Jr, State of Virginia, State of Virginia  
36 1. Plaintiff re-affirms all the aforesaid herein and state:  
37 2. Wherefore, causing plaintiffs damages, grief, undue  
38 stressors, emotional distress, fees, fines sabotaging  
39 plaintiffs statue of limitations, obstructing Justice. And

1 plaintiff is entitled to damages demanded herein of  
2 \$3,000,000.00 PLUS Punitive damages and the courts have held  
3 that pro per litigants can receive attorney type fees for  
4 litigations/working, just like in probate matters; the  
5 administrator is paid for all hours worked on the  
6 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's  
7 Jerry Theodore McCallup JR Beneficiary and Power of attorney  
8 and medical Power of Attorney documented with the military  
9 and other courts in other states including Virginia. No  
10 court, no hospital, NO action concerning Plaintiff Jerry  
11 Theodore McCallup JR. can proceed without Plaintiff Dr.  
12 Veronica McCallup DSc.

13 **CLAIM III Title 18, U.S.C., Section 241 - Conspiracy Against**  
14 **Rights DEMAND \$3,000,000.00**

15 Defendants: Williamsburg Department of Human Services social  
16 services Division , Scarlett Huang (compliance officer) Envoy of  
17 Williamsburg, Wendy Evans Williamsburg human services, Brittany  
18 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
19 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, Jeremy  
20 McCallup Wife, Fahad Al-Jarboua, County of James city county,  
21 Brain L. Stevenson Jr, State of Virginia

22 1. Plaintiff re-affirms all the aforesaid herein and state:  
23 2. That plaintiff had the right to medical treatment in another  
24 state and defendants Deborah Al-Jarboua, Fahad Al-Jarboua,  
25 Jeremy McCallup, Jeremy Mccallup wife Jerry Theodore  
McCallup III, wendy Evans, Britanny Moore, Consulate Health  
Care, Envoy of Williamsburg, Sentara Health Care, City of  
Williamsburg, James city county, knew that Defendant Jeremy  
McCallup has some type/kind of mental slowness, mental  
deficit and cannot be responsible for human life, But they  
all , and with MORE co-conspirators, didn't want plaintiff  
Dr. Veronica McCallup DSc involved. They co-conspired to get  
Plaintiffs money and life.

1

2 **CLAIM IV 18 USC 242: Deprivation of rights under color of law**

3

4

5 **DEMAND \$3,000,000.00**

6

7 Defendants: Williamsburg Department of Human Services social  
8 services Division , Scarlett Huang (compliance officer) Envoy of  
9 Williamsburg, Wendy Evans Williamsburg human services, Brittany  
10 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
11 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, Jeremy  
12 McCallup Wife, Fahad Al-Jarboua, County of James city county,  
13 Brain L. Stevenson Jr , Consulate Health Care , State of Virginia

14 1. Plaintiff re-affirms all the aforesaid herein and state:

15 2. Defendants violated plaintiffs Tier 4 HIPPA Violations. The  
16 penalties for violations of HIPAA Rules can be severe. HHS  
17 Office for Civil Rights can issue fines of up to \$1.5  
18 million per violation category, per year. In this action 3  
19 years time 1.5 million for HIPPA and 13 million for loss of  
20 business and

21 i. While healthcare providers, health plans, and business  
22 associates of covered entities can be fined, there are  
23 also potential fines for individuals who violate HIPAA  
24 Rules and criminal penalties may be appropriate. A jail  
25 term for violating HIPAA is a possibility, with some  
26 violations carrying a penalty of up to 10 years in jail.

27 3. Wherefore, causing plaintiffs damages, grief, undue  
28 stressors, emotional distress, fees, fines sabotaging  
plaintiffs statue of limitations, obstructing Justice. And  
plaintiff is entitled to damages demanded herein of  
\$3,000,000.00 PLUS Punitive damages and the courts have held  
that pro per litigants can receive attorney type fees for  
litigations/working, just like in probate matters; the  
administrator is paid for all hours worked on the  
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
Theodore McCallup JR Beneficiary and Power of attorney and

1 medical Power of Attorney documented with the military and  
2 other courts in other states including Virginia. No court, no  
3 hospital, NO action concerning Plaintiff Jerry Theodore  
4 McCallup JR. can proceed without Plaintiff Dr. Veronica  
McCallup DSc.

5 **CLAIM V HIPPA VIOLATIONS Impermissible disclosures of protected**

6 **health information (PHI)** Damage Demand \$1,500,000.00 PER

7 VIOLATION

8 Defendants: Williamsburg Department of Human Services social  
9 services Division, Wendy Evans Williamsburg human services,  
10 Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry  
11 Theodore McCallup III, Deborah Al-Jarboua, Jeremy McCallup  
12 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city  
13 county, Brain L. Stevenson Jr

14 1. Plaintiff affirms all aforesaid and state: Plaintiff cause  
15 of death is listed as "Diabetes, seizures, High Blood  
16 Pressure". All of these conditions are treatable with diet.

17 2. **Employees disclosing information** - Employees' gossiping  
18 about patients to friends or coworkers is also a HIPAA  
19 violation that can cost a practice a significant fine.  
20 Employees must be mindful of their environment, restrict  
conversations regarding patients to private places, and  
avoid sharing any patient information with friends and  
family.

21  
22 **Texting patient information** - Texting patient information such as  
vital signs or test results is often an easy way that providers  
can relay information quickly. While it may seem harmless, it is  
potentially placing patient data in the hands of cyber criminals  
who could easily access this information. There are new  
encryption programs that allow confidential information to be  
safely texted, but both parties must have it installed on their  
wireless device, which is typically not the case.

23  
24  
25  
26  
27  
28 **5. Social Media** - Posting patient photos on social media is a  
HIPAA violation. While it may seem harmless if a name is not  
mentioned, someone may recognize the patient and know the

1 doctor's specialty, which is a breach of the patient's privacy.  
2 Make sure all employees are aware that the use of social media to  
3 share patient information is considered a violation of HIPAA law.

4 **6. Employees illegally accessing patient files** - Employees  
5 accessing patient information when they are not authorized is  
6 another very common HIPAA violation. Whether it is out of  
7 curiosity, spite, or as a favor for a relative or friend, this is  
8 illegal and can cost a practice substantially. Also, individuals  
9 that use or sell PHI for personal gain can be subject to fines  
10 and even prison time.

11 **7. Social breaches** - An accidental breach of patient information  
12 in a social situation is quite common, especially in smaller more  
13 rural areas. Most patients are not aware of HIPAA laws and may  
14 make an innocent inquiry to the healthcare provider or clinician  
15 at a social setting about their friend who is a patient. While  
16 these types of inquiries will happen, it is best to have an  
17 appropriate response planned well in advance to reduce the  
18 potential of accidentally releasing private patient information.

19 **8. Authorization Requirements** - A written consent is required for  
20 the use or disclosure of any individual's personal health  
21 information that is not used for treatment, payment, healthcare  
22 operations, or permitted by the Privacy Rule. If an employee is  
23 not sure, it is always best to get prior authorization before  
24 releasing any information.

25       ii. Plaintiff was in the United States Military 25-26 years.  
26           Retired with NO health issues out of Chicago Illinois and  
27           was employed as something like a civilian medical Nursing  
28           observer for the military Nurses around the world. His  
          health was always under care and observation.

29       iii. For defendant Brittany Moore to seek a court order; to  
30           place Plaintiff under adult protective services and force  
31           him out of his home; for NOT taking a pill against his  
32           religious beliefs, culture and Religious dietary  
33           guidelines and restrictions, amounts to: medical  
34           malpractice, Reckless endangerment, Negligence, Wrongful  
35           death and violates Religious Right to diet.

1       iv. Defendants Sentara Williamsburg Regional Medical Center  
2           and other Medical facilities, doctors, wrongful diagnosis  
3           plaintiff and unlawfully administering medications without  
4           Power of attorney and medical power of attorney, which  
5           amounts to malpractice.

6       v. Plaintiff had a knee injury that the United States  
7           Military was treating and these defendants allowed  
8           plaintiff to suffer extensively without treating the knee  
9           and administering contra-indicating medicines. The pain in  
10           plaintiff's knee obvious cause the plaintiff's blood  
11           pressure to show FALSE elevations and Plaintiff being in  
12           duress, caused FALSE blood pressure readings.

13       3. AS a Result of these actions Defendant(s) Caused the Death of  
14           Jerry Theodore McCallup Jr. and plaintiff seek the said damages.  
15           Wherefore, causing plaintiffs damages, grief, undue stressors,  
16           emotional distress, fees, fines sabotaging plaintiffs statue of  
17           limitations, obstructing Justice. And plaintiff is entitled to  
18           damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
19           and the courts have held that pro per litigants can receive  
20           attorney type fees for litigations/working, just like in probate  
21           matters; the administrator is paid for all hours worked on the  
22           estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
23           Theodore McCallup JR Beneficiary and Power of attorney and  
24           medical Power of Attorney documented with the military and other  
25           courts in other states including Virginia. No court, no hospital,  
26           NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
27           proceed without Plaintiff Dr. Veronica McCallup DSc.

28       **CLAIM VI HIPPA VIOLATIONS Unauthorized accessing of PHI Damage**

29       Demand \$1,500,000.00 PER VIOLATION

30       Defendants: Williamsburg Department of Human Services social  
31           services Division, Wendy Evans Williamsburg human services,  
32           Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry  
33           Theodore McCallup III, Deborah Al-Jarboua, Jeremy McCallup  
34           Jeremy McCallup Wife, Fahad Al-Jarboua Envoy of Williamsburg,  
35           County of James city county, Brain L. Stevenson Jr

36       1. Plaintiff re-affirms all aforesaid.

1 **Texting patient information** - Texting patient information such as  
2 vital signs or test results is often an easy way that providers  
3 can relay information quickly. While it may seem harmless, it is  
4 potentially placing patient data in the hands of cyber criminals  
5 who could easily access this information. There are new  
6 encryption programs that allow confidential information to be  
7 safely texted, but both parties must have it installed on their  
8 wireless device, which is typically not the case.

9

10 **5. Social Media** - Posting patient photos on social media is a  
11 HIPAA violation. While it may seem harmless if a name is not  
12 mentioned, someone may recognize the patient and know the  
13 doctor's specialty, which is a breach of the patient's privacy.  
14 Make sure all employees are aware that the use of social media to  
15 share patient information is considered a violation of HIPAA law.

16

17 **6. Employees illegally accessing patient files** - Employees  
18 accessing patient information when they are not authorized is  
19 another very common HIPAA violation. Whether it is out of  
20 curiosity, spite, or as a favor for a relative or friend, this is  
21 illegal and can cost a practice substantially. Also, individuals  
22 that use or sell PHI for personal gain can be subject to fines  
23 and even prison time.

24

25 **7. Social breaches** - An accidental breach of patient information  
26 in a social situation is quite common, especially in smaller more  
27 rural areas. Most patients are not aware of HIPAA laws and may  
28 make an innocent inquiry to the healthcare provider or clinician  
at a social setting about their friend who is a patient. While  
these types of inquiries will happen, it is best to have an  
appropriate response planned well in advance to reduce the  
potential of accidentally releasing private patient information.

29

30 **8. Authorization Requirements** - A written consent is required for  
31 the use or disclosure of any individual's personal health  
32 information that is not used for treatment, payment, healthcare  
33 operations, or permitted by the Privacy Rule. If an employee is  
34 not sure, it is always best to get prior authorization before  
35 releasing any information.

36

37 **9. Wherefore, causing plaintiffs damages, grief, undue  
38 stressors, emotional distress, fees, fines sabotaging  
39 plaintiffs statue of limitations, obstructing Justice. And**

1 plaintiff is entitled to damages demanded herein of  
2 \$3,000,000.00 PLUS Punitive damages and the courts have held  
3 that pro per litigants can receive attorney type fees for  
4 litigations/working, just like in probate matters; the  
5 administrator is paid for all hours worked on the  
6 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's  
7 Jerry Theodore McCallup JR Beneficiary and Power of attorney  
8 and medical Power of Attorney documented with the military  
9 and other courts in other states including Virginia. No  
10 court, no hospital, NO action concerning Plaintiff Jerry  
11 Theodore McCallup JR. can proceed without Plaintiff Dr.  
12 Veronica McCallup DSc.

13 **CLAIM VII HIPPA VIOLATIONS Failure to conduct a risk analysis**

14 Damage Demand \$1,500,000.00 PER VIOLATION

15 Defendants: Williamsburg Department of Human Services social  
16 services Division, Wendy Evans Williamsburg human services,  
17 Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry  
18 Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup  
19 Jeremy McCallup Wife, Fahad Al-Jarboua, Envoy of Williamsburg,  
20 County of James city county

21 1. Plaintiff affirms all aforesaid and state:

22 2. **Lost or Stolen Devices** - Theft of PHI (protected health  
23 information) through lost or stolen laptops, desktops,  
24 smartphones, and other devices that contain patient  
25 information can result in HIPAA fines. Mobile devices are  
26 the most vulnerable to theft because of their size;  
27 therefore, the necessary safeguards should be put into place  
28 such as password protected authorization and encryption to  
access patient-specific information.

29 3. **Accessing patient information on home computers** - Most  
30 clinicians use their home computers or laptops after hours  
31 from time to time to access patient information to record  
32 notes or follow-ups. This could potentially result in a  
33 HIPAA violation if the screen is accidentally left on and a  
34 family member uses the computer. Make sure your computer and  
35 laptop are password protected and keep all mobile devices  
36 out of sight to reduce the risk of patient information being  
37 accessed or stolen.

1       4. **Lack of training** - One of the most common reasons for a  
2       HIPAA violation is an employee who is not familiar with  
3       HIPAA regulations. Often only managers, administration, and  
4       medical staff receive training although HIPAA law requires  
5       all employees, volunteers, interns and anyone with access to  
6       patient information to be trained. Compliance training is  
7       one of the most proactive and easiest ways to avoid a  
8       violation.

9       5. Wherefore, causing plaintiffs damages, grief, undue  
10       stressors, emotional distress, fees, fines sabotaging  
11       plaintiffs statue of limitations, obstructing Justice. And  
12       plaintiff is entitled to damages demanded herein of  
13       \$3,000,000.00 PLUS Punitive damages and the courts have held  
14       that pro per litigants can receive attorney type fees for  
15       litigations/working, just like in probate matters; the  
16       administrator is paid for all hours worked on the  
17       estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's  
18       Jerry Theodore McCallup JR Beneficiary and Power of attorney  
19       and medical Power of Attorney documented with the military  
20       and other courts in other states including Virginia. No  
21       court, no hospital, NO action concerning Plaintiff Jerry  
22       Theodore McCallup JR. can precede without Plaintiff Dr.  
23       Veronica McCallup DSc.

24  
25       **CLAIM VIII WRONGFUL DEATH** Damage Demand \$3,000,000.00  
26       Defendants: Williamsburg Department of Human Services social  
27       services Division, Envoy of Williamsburg, Wendy Evans  
28       Williamsburg human services, Brittany Moore, Consulate Heath  
Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah  
Al-Jarboua, Jeremy Mccallup, Jeremy McCallup Wife, Fahad Al-  
Jarboua, County of James city county, Brain L. Stevenson Jr ,  
State of Virginia  
Plaintiff re-affirms all aforesaid and state: AS a Result of  
these defendants actions Defendant(s) Caused the Death of Jerry  
Theodore McCallup Jr. and due to a preventable medical error or  
the reckless/negligent behavior of another and plaintiff seek the

1 said damages. The defendant Jeremy and Deborah Al-jarboau and  
2 Fahad and the human services, pull the plug on Plaintiff Jerry  
3 Theodore McCallup without contacting his son Jerry Theodore  
4 McCallup III and his power of attorney Dr. Veronica Renee  
5 MCcallup DSc.

- 6 i. Wrongful Death This Civil action and Complaint is for  
7 damages sustained by plaintiff(s) for the malicious and  
8 intentional actions and wrongful death caused by  
9 defendants, they have cause the wrongful death of  
plaintiff using trickery, theft of identification,  
deprival of medical care . VA 8.01 -50 VA 8.01 - 244 1977  
c.617, 1958 c 470, 1981 c 115, 2012 c 725 Shepard v.  
Capitol Foundry of Va., 262 Va. 715, 718-719 (Va. 2001)
- 10 ii. Deprival of Medical Care and medical care in another State
- 11 iii. Several HIPAA violations which are failure to comply with  
any aspect of HIPAA standards and provisions detailed in  
detailed in 45 CFR Parts 160, 162, and 164.
- 12 iv. Defendants Administered contraindicated medicines to  
plaintiff Jerry Theodore McCallup Jr, that caused him  
seizures and brain injury , Renal Failure, and death;  
against plaintiffs continual complaints that those  
medicines being contraindicative to him. This is proven by  
the defendants illegally having to forcibly get an illegal  
court order and forcibly administer contraindicative drugs  
before and after February 2019 and defendants continually  
forcing medicines on Plaintiff through and including  
February 2019 until about March 2, 2019 when plaintiff  
died from the prior times of forced drugging. Plaintiff is  
a retired military vet that didn't have any medical  
problems that would cause death. The defendant had been an  
athlete all his life and father was a professional athlete  
and sister an athlete. Athletics and health conscience is  
a family trait.
- 22 2. Wherefore, causing plaintiffs damages, grief, undue stressors,  
emotional distress, fees, fines sabotaging plaintiffs statue of  
limitations, obstructing Justice. And plaintiff is entitled to  
damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
and the courts have held that pro per litigants can receive  
attorney type fees for litigations/working, just like in probate  
matters; the administrator is paid for all hours worked on the  
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
Theodore McCallup JR Beneficiary and Power of attorney and  
medical Power of Attorney documented with the military and other  
courts in other states including Virginia. No court, no hospital,

1 NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
2 precede without Plaintiff Dr. Veronica McCallup DSc.

3 **CLAIM IX ELDER ABUSE** Damage Demand of 1,500,000.00 .  
4 Defendants: Scarlett Huang (compliance officer),  
5 Williamsburg Department of Human Services social services  
6 Division, Envoy of Williamsburg, Wendy Evans Williamsburg human  
7 services, Brittany Moore, Consulate Heath Care, Sentara Health  
8 Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy  
9 McCallup, Jeremy McCallup Wife, Fahad Al-Jarboua, County of James  
city county , Brain L. Stevenson Jr, State of Virginia

10 1. Plaintiff re-affirms all the aforesaid herein and state:  
11 2. The defendants: City of Williamsburg, Williamsburg human  
12 service, Jeremy McCallup, Deborah Al-Jarboua, Fahad Al-  
13 Jarboua and Jeremy McCallup wife had plaintiff in a motel 6,  
14 when he received \$3,400-\$4,900.00 per month in income. The  
15 county could have found a senior apartment for Mr. Jerry  
16 McCallup Jr. Code of Virginia **Title 18.2. Crimes and**  
17 **Offenses Generally** » **Chapter 8. Crimes Involving Morals and**  
18 **Decency** » **Article 4. Family Offenses; Crimes Against**  
19 **Children, Etc.** » **§ 18.2-369. Abuse and neglect of**  
20 **incapacitated adults; penalty**

21 3. Plaintiff further supports the theory that plaintiff knew  
22 defendants were trying to rob him/swindle him about 2014.  
23 Plaintiff tried to separate from the Cuban/Arab defendants and  
24 plaintiff \$350,000 home entered foreclosure after owning the  
25 home and another house and properties over twenty (20) years.  
26 4. Plaintiff believes these defendants had been poisoning  
27 plaintiff in the home; prior to any medical conditions and rush  
28 to have plaintiff cremated before plaintiff family learned of  
plaintiffs death. Plaintiff had enough money for burial and  
plaintiff family is against cremations defendants cremated to  
cover up drugging of Plaintiff Jerry Theodore McCallup JR.  
Plaintiff has requested medical files for a year and defendants  
have fail to release them as though they are changing the  
records.

1 5. Wherefore, causing plaintiffs damages, grief, undue stressors,  
2 emotional distress, fees, fines sabotaging plaintiffs statue of  
3 limitations, obstructing Justice. And plaintiff is entitled to  
4 damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
and the courts have held that pro per litigants can receive  
5 attorney type fees for litigations/working, just like in probate  
matters; the administrator is paid for all hours worked on the  
6 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
7 Theodore McCallup JR Beneficiary and Power of attorney and  
medical Power of Attorney documented with the military and other  
8 courts in other states including Virginia. No court, no hospital,  
NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
precede without Plaintiff Dr. Veronica McCallup DSc.

9

10 **CLAIM X FINANCIAL ELDER ABUSE Demand demand \$1,500,000.00**  
11 misappropriation of financial resources or abusive use  
12 of financial control, in the context of a relationship where  
there is an expectation of trust, causes harm to an older person.

13 Defendants: Williamsburg Department of Human Services social  
14 services Division , Scarlett Huang (compliance officer), Envoy  
of Williamsburg, Wendy Evans Williamsburg human services,  
15 Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry  
16 Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup  
17 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city  
18 county, Brain L. Stevenson Jr

19 1. Plaintiff re-affirms all the aforesaid herein and state:

20 2. The Older Americans Act of 2006 defines elder financial  
21 abuse, or financial exploitation, as "the fraudulent or  
22 otherwise illegal, unauthorized, or improper act or process  
23 of an individual, including a caregiver or fiduciary, that  
24 uses the resources of an older individual for monetary or  
25 personal benefit, profit, or gain, or that results in  
26 depriving an older individual of rightful access to, or use  
27 of, benefits, resources, belongings, or assets.

28 3. Wherefore, causing plaintiffs damages, grief, undue stressors,  
emotional distress, fees, fines sabotaging plaintiffs statue of

1 limitations, obstructing Justice. And plaintiff is entitled to  
2 damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
3 and the courts have held that pro per litigants can receive  
4 attorney type fees for litigations/working, just like in probate  
5 matters; the administrator is paid for all hours worked on the  
6 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
7 Theodore McCallup JR Beneficiary and Power of attorney and  
medical Power of Attorney documented with the military and other  
courts in other states including Virginia. No court, no hospital,  
NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
precede without Plaintiff Dr. Veronica McCallup DSc.

8

9

10 **CLAIM XI HIPPA VIOLATIONS Failure to manage risks to the**  
**confidentiality, integrity, and availability of PHI** Damage Demand

11 \$3,500,000.00 PER VIOLATION

12 Defendants: Scarlett Huang (compliance officer), Envoy of  
13 Williamsburg, Brittany moore, wendy evans, city of Williamsburg,  
14 state of virginia ,Consulate Health Care, Sentara Health Care,

15 1. Plaintiff affirms all aforesaid and state: These defendants  
16 never identified that the persons they relied on for advice  
and that authorized medications to plaintiff did NOT have  
17 the authority to make decisions for Plaintiff Jerry Theodore  
McCallup JR. 2014-2019, 2018-2019, even at time of death  
18 when the defendants Al-Jarboua told defendant Envoy of  
19 Williamsburg to pull the plug (per written records).

20 2. **Medical records mishandling** - Another very common HIPAA  
21 violation is the mishandling of patient records. If a  
22 practice uses written patient charts or records, a physician  
23 or nurse may accidentally leave a chart in the patient's  
24 exam room available for another patient to see. Printed  
25 medical records must be kept locked away and safe out of the  
26 public's view.

27 3. AS a Result of these defendants actions Defendant(s) Caused  
the Death of Jerry Theodore McCallup Jr. and plaintiff seek  
28 the said damages. Wherefore, causing plaintiffs damages,  
grief, undue stressors, emotional distress, fees, fines

1 sabotaging plaintiffs statue of limitations, obstructing  
2 Justice. And plaintiff is entitled to damages demanded  
3 herein of \$3,000,000.00 PLUS Punitive damages and the courts  
4 have held that pro per litigants can receive attorney type  
5 fees for litigations/working, just like in probate matters;  
6 the administrator is paid for all hours worked on the  
7 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's  
8 Jerry Theodore McCallup JR Beneficiary and Power of attorney  
and medical Power of Attorney documented with the military  
and other courts in other states including Virginia. No  
court, no hospital, NO action concerning Plaintiff Jerry  
Theodore McCallup JR. can precede without Plaintiff Dr.  
Veronica McCallup DSc.

**CLAIM XII HIPPA VIOLATIONS Failure to implement safeguards to ensure the confidentiality, integrity, and availability of PHI**

11 | Damage Demand \$1,500,000.00 PER VIOLATION

Defendants: Williamsburg Department of Human Services social

12 services Division, Scarlett Huang (compliance officer), Envoy of  
13 Williamsburg, County of James city county

14 1. Plaintiff re-affirms all the aforesaid herein and state:  
15 2. Defendant Deborah al-jarboua is on all Plaintiff Jerry Theodore  
16 Medical records causing him to be given medications adverse to  
17 him and our family. She is listed as his wife. She isn't his  
18 wife, it's a lie. And that Plaintiffs death is a result of this  
19 woman and defendants failing safeguard the elderly and ensure the  
20 confidentiality of patients medical history. Plaintiff was given  
21 blood pressure pills in 1999 and learned that he could not take  
22 them and that the problem was his food. He changed his diet them.  
23 So medication thereafter is from Defendants all doctors over  
24 prescribing and not adjusting plaintiffs medication before  
25 seizures and taking the advice of defendants al-jarboua's.

26 3. Wherefore, causing plaintiffs damages, grief, undue stressors,  
27 emotional distress, fees, fines sabotaging plaintiffs statue of  
28 limitations, obstructing Justice. And plaintiff is entitled to  
damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
and the courts have held that pro per litigants can receive

1 attorney type fees for litigations/working, just like in probate  
2 matters; the administrator is paid for all hours worked on the  
3 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
4 Theodore McCallup JR Beneficiary and Power of attorney and  
5 medical Power of Attorney documented with the military and other  
courts in other states including Virginia. No court, no hospital,  
NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
precede without Plaintiff Dr. Veronica McCallup DSc.

6

7 **CLAIM XIII HIPPA VIOLATIONS Failure to maintain and monitor PHI**

8 **access logs** Damage Demand \$1,500,000.00 PER VIOLATION  
9 Defendants: Williamsburg Department of Human Services social  
10 services Division, Scarlett Huang (compliance officer) ,  
11 Envoy of Williamsburg, Department of Human Services social  
12 services Division , Scarlett Huang (compliance officer) Envoy of  
13 Williamsburg, Wendy Evans Williamsburg human services, Brittany  
14 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
15 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, Jeremy  
16 McCallup Wife, Fahad Al-Jarboua, County of James city county

17 1. Plaintiff re-affirms all the aforesaid herein and state:  
18 2. Wherefore, causing plaintiffs damages, grief, undue  
19 stressors, emotional distress, fees, fines sabotaging  
20 plaintiffs statue of limitations, obstructing Justice. And  
21 plaintiff is entitled to damages demanded herein of  
22 \$3,000,000.00 PLUS Punitive damages and the courts have held  
23 that pro per litigants can receive attorney type fees for  
24 litigations/working, just like in probate matters; the  
25 administrator is paid for all hours worked on the  
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's  
Jerry Theodore McCallup JR Beneficiary and Power of attorney  
and medical Power of Attorney documented with the military  
and other courts in other states including Virginia. No  
court, no hospital, NO action concerning Plaintiff Jerry  
Theodore McCallup JR. can precede without Plaintiff Dr.  
Veronica McCallup DSc.

26

27 **CLAIM XIV HIPPA VIOLATIONS Failure to enter into a HIPAA-**  
**compliant business associate agreement with vendors prior to**  
**giving access to PHI** Damage Demand \$1,500,000.00 PER VIOLATION

1 Defendants: Envoy of Williamsburg, Williamsburg Department of  
2 Human Services social services Division , Scarlett Huang  
3 (compliance officer) Envoy of Williamsburg, Wendy Evans  
4 Williamsburg human services, Brittany Moore, Consulate Heath  
5 Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah  
6 Al-Jarboua, Jeremy Mccallup, Jeremy McCallup Wife, Fahad Al-  
7 Jarboua, Brain L. Stevenson Jr , All doctors on records still in  
discovery

8 1. Plaintiff re-affirms all the aforesaid herein and state:  
9 2. Wherefore, causing plaintiffs damages, grief, undue  
10 stressors, emotional distress, fees, fines sabotaging  
11 plaintiffs statue of limitations, obstructing Justice. And  
12 plaintiff is entitled to damages demanded herein of  
13 \$3,000,000.00 PLUS Punitive damages and the courts have held  
14 that pro per litigants can receive attorney type fees for  
15 litigations/working, just like in probate matters; the  
16 administrator is paid for all hours worked on the  
17 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's  
18 Jerry Theodore McCallup JR Beneficiary and Power of attorney  
19 and medical Power of Attorney documented with the military  
20 and other courts in other states including Virginia. No  
21 court, no hospital, NO action concerning Plaintiff Jerry  
22 Theodore McCallup JR. can precede without Plaintiff Dr.  
23 Veronica McCallup DSc.

24 **CLAIM XV HIPPA VIOLATIONS Failure to maintain and monitor PHI**

25 **access logs** Damage Demand \$1,500,000.00 PER VIOLATION  
26 Defendants: Williamsburg Department of Human Services social  
27 services Division, Envoy of Williamsburg, Department of Human  
28 Services social services Division , Scarlett Huang (compliance  
officer) Envoy of Williamsburg, Wendy Evans Williamsburg human  
services, Brittany Moore, Consulate Heath Care, Sentara Health  
Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy  
Mccallup, Jeremy McCallup Wife, Fahad Al-Jarboua, Brain L.  
Stevenson Jr

1. Plaintiff re-affirms all the aforesaid herein and state:

1       2. Wherefore, causing plaintiffs damages, grief, undue  
2       stressors, emotional distress, fees, fines sabotaging  
3       plaintiffs statue of limitations, obstructing Justice. And  
4       plaintiff is entitled to damages demanded herein of  
5       \$3,000,000.00 PLUS Punitive damages and the courts have held  
6       that pro per litigants can receive attorney type fees for  
7       litigations/working, just like in probate matters; the  
8       administrator is paid for all hours worked on the  
9       estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's  
10      Jerry Theodore McCallup JR Beneficiary and Power of attorney  
11      and medical Power of Attorney documented with the military  
12      and other courts in other states including Virginia. No  
13      court, no hospital, NO action concerning Plaintiff Jerry  
14      Theodore McCallup JR. can precede without Plaintiff Dr.  
15      Veronica McCallup DSc.  
16

16      **CLAIM XVI HIPPA VIOLATIONS Failure to provide patients with**  
17      **copies of their PHI** on request Damage Demand \$1,500,000.00 PER  
18      VIOLATION

19      Defendants: Scarlett Huang (compliance officer), Envoy of  
20      Williamsburg , Brain L. Stevenson Jr  
21      1. Plaintiff re-affirms all the aforesaid herein and state:

22       2. Wherefore, causing plaintiffs damages, grief, undue  
23       stressors, emotional distress, fees, fines sabotaging  
24       plaintiffs statue of limitations, obstructing Justice. And  
25       plaintiff is entitled to damages demanded herein of  
26       \$3,000,000.00 PLUS Punitive damages and the courts have held  
27       that pro per litigants can receive attorney type fees for  
28       litigations/working, just like in probate matters; the  
      administrator is paid for all hours worked on the  
      estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
      Theodore McCallup JR Beneficiary and Power of attorney and  
      medical Power of Attorney documented with the military and  
      other courts in other states including Virginia. No court, no  
      hospital, NO action concerning Plaintiff Jerry Theodore  
      McCallup JR. can precede without Plaintiff Dr. Veronica  
      McCallup DSc.

29      **CLAIM XVII HIPPA VIOLATIONS Failure to implement access controls**  
30      **to limit who can view PHI** Damage Demand \$1,500,000.00 PER  
31      VIOLATION  
32      Defendants: Williamsburg Department of Human Services social  
33      services Division, Brain L. Stevenson Jr , Scarlett Huang

1 (compliance officer), Envoy of Williamsburg, Wendy Evans  
2 Williamsburg human services, Brittany Moore, Consulate Heath  
3 Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah  
4 Al-Jarboua, Jeremy Mccallup ,Jeremy McCallup Wife, Fahad Al-  
5 Jarboua, County of James city county, Brain L. Stevenson Jr  
6 1. Plaintiff re-affirms all the aforesaid herein and state:  
7 2. Wherefore, causing plaintiffs damages, grief, undue stressors,  
8 emotional distress, fees, fines sabotaging plaintiffs statue of  
9 limitations, obstructing Justice. And plaintiff is entitled to  
10 damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
11 and the courts have held that pro per litigants can receive  
12 attorney type fees for litigations/working, just like in probate  
13 matters; the administrator is paid for all hours worked on the  
14 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
15 Theodore McCallup JR Beneficiary and Power of attorney and  
16 medical Power of Attorney documented with the military and other  
17 courts in other states including Virginia. No court, no hospital,  
18 NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
19 precede without Plaintiff Dr. Veronica McCallup DSc.  
20  
21

22 **CLAIM XVIII HIPPA VIOLATIONS The disclosure more PHI than is**  
23 **necessary for a particular task to be performed** Damage Demand

24 \$1,500,000.00 PER VIOLATION  
25 Defendants: Williamsburg Department of Human Services social  
26 services Division, Envoy of Williamsburg, Scarlett Huang  
27 (compliance officer) Envoy of Williamsburg, Wendy Evans  
28 Williamsburg human services, Brittany Moore, Consulate Heath  
Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah  
Al-Jarboua, Jeremy Mccallup, Brain L. Stevenson Jr , Jeremy  
McCallup Wife, Fahad Al-Jarboua, County of James city county  
1. Plaintiff re-affirms all the aforesaid herein and state:  
2. Wherefore, causing plaintiffs damages, grief, undue stressors,  
emotional distress, fees, fines sabotaging plaintiffs statue of  
limitations, obstructing Justice. And plaintiff is entitled to  
damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
and the courts have held that pro per litigants can receive

1 attorney type fees for litigations/working, just like in probate  
2 matters; the administrator is paid for all hours worked on the  
3 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
4 Theodore McCallup JR Beneficiary and Power of attorney and  
5 medical Power of Attorney documented with the military and other  
courts in other states including Virginia. No court, no hospital,  
NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
precede without Plaintiff Dr. Veronica McCallup DSc.

7 **CLAIM XIX HIPPA VIOLATIONS Failure to provide HIPAA training and**  
8 **security awareness training** Damage Demand \$1,500,000.00 PER

9 VIOLATION

10 Defendants: Williamsburg Department of Human Services social  
11 services Division, Envoy of Williamsburg, Department of Human  
12 Services social services Division , Scarlett Huang (compliance  
13 officer) Envoy of Williamsburg, Wendy Evans Williamsburg human  
14 services, Brittany Moore, Consulate Heath Care, Sentara Health  
Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy  
15 McCallup, Jeremy McCallup Wife, Fahad Al-Jarboua, County of James  
16 city county, Brain L. Stevenson Jr

17 1. Plaintiff re-affirms all the aforesaid herein and state:  
18 2. Wherefore, causing plaintiffs damages, grief, undue stressors,  
19 emotional distress, fees, fines sabotaging plaintiffs statue of  
limitations, obstructing Justice. And plaintiff is entitled to  
damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
and the courts have held that pro per litigants can receive  
attorney type fees for litigations/working, just like in probate  
matters; the administrator is paid for all hours worked on the  
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
Theodore McCallup JR Beneficiary and Power of attorney and  
medical Power of Attorney documented with the military and other  
courts in other states including Virginia. No court, no hospital,  
NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
precede without Plaintiff Dr. Veronica McCallup DSc.

26 **CLAIM XX HIPPA VIOLATIONS Theft of patient records** Damage Demand

27 \$1,500,000.00 PER VIOLATION

28 Defendants: Williamsburg Department of Human Services social  
services Division, Envoy of Williamsburg, Department of Human

1 Services social services Division , Scarlett Huang (compliance  
2 officer) Envoy of Williamsburg, Wendy Evans Williamsburg human  
3 services, Brittany Moore, Consulate Heath Care, Sentara Health  
4 Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy  
5 McCallup, Jeremy McCallup Wife, Fahad Al-Jarboua, County of James  
6 city county, Brain L. Stevenson Jr

7 1. Plaintiff re-affirms all the aforesaid herein and state:  
8 2. Wherefore, causing plaintiffs damages, grief, undue stressors,  
9 emotional distress, fees, fines sabotaging plaintiffs statue of  
10 limitations, obstructing Justice. And plaintiff is entitled to  
11 damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
12 and the courts have held that pro per litigants can receive  
13 attorney type fees for litigations/working, just like in probate  
14 matters; the administrator is paid for all hours worked on the  
15 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
16 Theodore McCallup JR Beneficiary and Power of attorney and  
17 medical Power of Attorney documented with the military and other  
18 courts in other states including Virginia. No court, no hospital,  
19 NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
20 precede without Plaintiff Dr. Veronica McCallup DSc.

21 **CLAIM XXI HIPPA VIOLATIONS Unauthorized release of PHI** to  
22 individuals not authorized to receive the information Damage  
23 Demand \$1,500,000.00 PER VIOLATION

24 Defendants: Williamsburg Department of Human Services social  
25 services Division, Envoy of Williamsburg , Scarlett Huang  
1 (compliance officer), Envoy of Williamsburg, Wendy Evans  
2 Williamsburg human services, Brittany Moore, Consulate Heath  
3 Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah  
4 Al-Jarboua, Jeremy McCallup , Jeremy McCallup Wife, Fahad Al-  
5 Jarboua, County of James city county, Brain L. Stevenson Jr

6 1. Plaintiff re-affirms all the aforesaid herein and state:  
7 2. Wherefore, causing plaintiffs damages, grief, undue  
8 stressors, emotional distress, fees, fines sabotaging  
9 plaintiffs statue of limitations, obstructing Justice. And  
10 plaintiff is entitled to damages demanded herein of  
11 \$3,000,000.00 PLUS Punitive damages and the courts have held  
12 that pro per litigants can receive attorney type fees for

1 litigations/working, just like in probate matters; the  
2 administrator is paid for all hours worked on the  
3 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
4 Theodore McCallup JR Beneficiary and Power of attorney and  
5 medical Power of Attorney documented with the military and  
6 other courts in other states including Virginia. No court, no  
7 hospital, NO action concerning Plaintiff Jerry Theodore  
8 McCallup JR. can precede without Plaintiff Dr. Veronica  
9 McCallup DSc.

10 **CLAIM XXII HIPPA VIOLATIONS Sharing of PHI** online or via social  
11 media without permission Damage Demand \$1,500,000.00 PER  
12 VIOLATION

13 Defendants: Envoy of Williamsburg, Williamsburg Department of  
14 Human Services social services Division , Scarlett Huang  
15 (compliance officer), Wendy Evans Williamsburg human services,  
16 Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry  
17 Theodore McCallup III, Deborah Al-Jarboua, Jeremy McCallup  
18 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city  
19 county, Brain L. Stevenson Jr

20 1. Plaintiff re-affirms all the aforesaid herein and state:  
21 2. Wherefore, causing plaintiffs damages, grief, undue stressors,  
22 emotional distress, fees, fines sabotaging plaintiffs statue of  
23 limitations, obstructing Justice. And plaintiff is entitled to  
24 damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
and the courts have held that pro per litigants can receive  
attorney type fees for litigations/working, just like in probate  
matters; the administrator is paid for all hours worked on the  
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
Theodore McCallup JR Beneficiary and Power of attorney and  
medical Power of Attorney documented with the military and other  
courts in other states including Virginia. No court, no hospital,  
NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
precede without Plaintiff Dr. Veronica McCallup DSc.

25 **CLAIM XXIII HIPPA VIOLATIONS Mishandling and mismailing PHI**

26 Damage Demand \$1,500,000.00 PER VIOLATION  
27 Defendants: Envoy of Williamsburg, Williamsburg Department of  
28 Human Services social services Division , Scarlett Huang  
(compliance officer), Wendy Evans Williamsburg human services,

1 Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry  
2 Theodore McCallup III, Deborah Al-Jarboua, Jeremy McCallup Jeremy  
3 McCallup Wife, Fahad Al-Jarboua, County of James city county  
4 1. Plaintiff re-affirms all the aforesaid herein and state:  
5 2. Wherefore, causing plaintiffs damages, grief, undue stressors,  
6 emotional distress, fees, fines sabotaging plaintiffs statue of  
7 limitations, obstructing Justice. And plaintiff is entitled to  
8 damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
9 and the courts have held that pro per litigants can receive  
10 attorney type fees for litigations/working, just like in probate  
11 matters; the administrator is paid for all hours worked on the  
12 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
13 Theodore McCallup JR Beneficiary and Power of attorney and  
14 medical Power of Attorney documented with the military and other  
15 courts in other states including Virginia. No court, no hospital,  
16 NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
17 precede without Plaintiff Dr. Veronica McCallup DSc.  
18

14 **CLAIM XXIV HIPPA VIOLATIONS Failure to encrypt PHI or use an**  
15 **alternative, equivalent measure to prevent unauthorized**

16 **access/disclosure** Damage Demand \$1,500,000.00 PER VIOLATION  
17 Defendants: Envoy of Williamsburg, Williamsburg Department of  
18 Human Services social services Division , Scarlett Huang  
19 (compliance officer), Wendy Evans Williamsburg human services,  
20 Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry  
21 Theodore McCallup III, Deborah Al-Jarboua, Jeremy McCallup,  
22 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city  
23 county

24 1. Plaintiff re-affirms all the aforesaid herein and state:  
25 2. Wherefore, causing plaintiffs damages, grief, undue stressors,  
26 emotional distress, fees, fines sabotaging plaintiffs statue of  
27 limitations, obstructing Justice. And plaintiff is entitled to  
28 damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
and the courts have held that pro per litigants can receive  
attorney type fees for litigations/working, just like in probate  
matters; the administrator is paid for all hours worked on the  
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
Theodore McCallup JR Beneficiary and Power of attorney and  
medical Power of Attorney documented with the military and other

1 courts in other states including Virginia. No court, no hospital,  
2 NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
3 precede without Plaintiff Dr. Veronica McCallup DSc.

4 **CLAIM XXV HIPPA VIOLATIONS Failure to notify an individual (or**  
5 **the Office for Civil Rights) of a security incident involving PHI**  
6 **within 60 days of the discovery of a breach** Damage Demand

7 \$1,500,000.00 PER VIOLATION

8 Defendants: Williamsburg Department of Human Services social  
9 services Division, Envoy of Williamsburg , Scarlett Huang  
10 (compliance officer), Wendy Evans Williamsburg human services,  
11 Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry  
12 Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup,  
13 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city  
14 county

15 1. Plaintiff re-affirms all the aforesaid herein and state:  
16 2. Wherefore, causing plaintiffs damages, grief, undue stressors,  
17 emotional distress, fees, fines sabotaging plaintiffs statue of  
18 limitations, obstructing Justice. And plaintiff is entitled to  
19 damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
20 and the courts have held that pro per litigants can receive  
21 attorney type fees for litigations/working, just like in probate  
22 matters; the administrator is paid for all hours worked on the  
23 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
24 Theodore McCallup JR Beneficiary and Power of attorney and  
25 medical Power of Attorney documented with the military and other  
26 courts in other states including Virginia. No court, no hospital,  
27 NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
28 precede without Plaintiff Dr. Veronica McCallup DSc.

23 **CLAIM XXVI HIPPA VIOLATIONS Failure to conduct a risk analysis**

24 \$1,500,000.00

25 Defendants: Williamsburg Department of Human Services social  
26 services Division, Scarlett Huang (compliance officer),  
27 Envoy of Williamsburg, County of James city county, Brain L.  
28 Stevenson Jr

1. Plaintiff re-affirms all the aforesaid herein and state:

1 2. Wherefore, causing plaintiffs damages, grief, undue stressors,  
2 emotional distress, fees, fines sabotaging plaintiffs statue of  
3 limitations, obstructing Justice. And plaintiff is entitled to  
4 damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
and the courts have held that pro per litigants can receive  
5 attorney type fees for litigations/working, just like in probate  
matters; the administrator is paid for all hours worked on the  
6 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
7 Theodore McCallup JR Beneficiary and Power of attorney and  
medical Power of Attorney documented with the military and other  
8 courts in other states including Virginia. No court, no hospital,  
NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
precede without Plaintiff Dr. Veronica McCallup DSc.  
9

10 **CLAIM XXVII HIPPA VIOLATIONS Texting PHI** \$1,500,000.00

11 Defendants: Williamsburg Department of Human Services social  
12 services Division, Department of Human Services social services  
13 Division , Scarlett Huang (compliance officer) Envoy of  
14 Williamsburg, Wendy Evans Williamsburg human services, Brittany  
15 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
16 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup  
17 Jeremy McCallup Wife, Fahad Al-Jarboua, Brain L. Stevenson Jr

18 1. Plaintiff re-affirms all the aforesaid herein and state:

19 2. Wherefore, causing plaintiffs damages, grief, undue stressors,  
emotional distress, fees, fines sabotaging plaintiffs statue of  
20 limitations, obstructing Justice. And plaintiff is entitled to  
damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
and the courts have held that pro per litigants can receive  
21 attorney type fees for litigations/working, just like in probate  
matters; the administrator is paid for all hours worked on the  
22 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
23 Theodore McCallup JR Beneficiary and Power of attorney and  
medical Power of Attorney documented with the military and other  
24 courts in other states including Virginia. No court, no hospital,  
NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
precede without Plaintiff Dr. Veronica McCallup DSc.  
25

26  
27 **CLAIM XXVIII HIPPA VIOLATIONS Failure to terminate access rights**  
28 **to PHI when no longer required** 1,500,000.00

1 Defendants: Williamsburg Department of Human Services social  
2 services Division, Scarlett Huang (compliance officer) Envoy of  
3 Williamsburg, Wendy Evans Williamsburg human services, Brittany  
4 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
5 McCallup III, Deborah Al-Jarboua, Jeremy McCallup  
6 Jeremy McCallup Wife, Fahad Al-Jarboua, Brain L. Stevenson Jr

7 1. Plaintiff re-affirms all the aforesaid herein and state:  
8 2. Plaintiff Jerry Theodore McCallup Jr repeatedly requested  
9 sister, Dr. Veronica McCallup DSc and defendants refused to  
locate plaintiff. (Beneficiary, Power of Attorney, Medical Power  
of Attorney). He would have moved in with his sister.  
10 3. Plaintiffs are Native American Indians who have been to college  
and Universities exceeding associate degrees in Science  
11 Technology and Medicine. Plaintiffs had a business together that  
they ran from Detroit Michigan. Chicago, IL, California, and  
12 Texas. Plaintiff CTI Chemicals and Allied Products, Inc. The  
13 killing, poisoning, hindering, blocking of plaintiffs contact  
with sister and business, obstruction, Interference was malicious  
14 and intentional, willful and wonton.  
15 4. Defendants Never had Jurisdiction to place plaintiff under  
ADULT PROTECTIVE SERVICES, and defendants never gave notice to  
16 all the family and plaintiffs; that there was court hearings or  
to any court hearing or court action. to place plaintiff under  
protective services was unlawful and done by NON\_FAMILY MEMBERS  
17 in co-conspiracy with Williamsburg social services and defendant  
Britany Moore. under these deprival of rights and lack of due  
18 process; plaintiff died and defendants basically KIDNAPPED  
plaintiff and forced death upon Plaintiff. The (Al-Jarboua's are  
19 NOT family members. The Cubans and Arabs are NOT family members,  
they pretended to be plaintiff "wife" (x-wife, plaintiff WASN'T  
20 married) and plaintiff son in Colorado (plaintiff son in Colorado  
wasn't in Virginia)). Jeremy McCallup was a married man and  
21 caused Jerry Theodore McCallup Jr williamsbug house to go into  
foreclosure by deception. (the bills were paid, everything was  
taken care of,...) Plaintiff Jerry Theodore McCallup Jr had a  
22 monthly income of \$3,400.00-\$4,900.00 and had 20 years of equity  
in the house. Theres no reason to lose the home except Defendant  
23 Jeremy McCallup , Fahad Al-jarboua and Deborah Al-jarboua scheme.  
Defendant Jeremy McCallup was 20- 22 years old and had gotten  
24 married and wanted the house.  
25 5. Defendants were discriminating against Plaintiff and forcing  
death upon plaintiff; because of his race, creed, nationality and  
culture. On plaintiff birth certificate and death certificate it

1 documents that plaintiff is a native American, an Indian.  
2 Plaintiff health could be treated with diet.  
3 6. Plaintiffs recently learned that defendants used and allowed  
4 defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy  
5 McCallup to pretend to be and to steal the identity of and  
6 aggravated identity theft, of: plaintiffs: 1. X-wife 2. plaintiff  
7 son; in order, to locate plaintiff money, insurance policies and  
8 property.  
9 7. Plaintiff learned that defendants wanted the plaintiff Jerry  
10 Theodore McCallup Jr dead/to die; to collect his money, bank  
11 accounts, insurances, and property and to ensure death, they  
12 blocked tricked, would not contact, plaintiff Jerry Theodore  
13 McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a  
14 medical doctor and who has been treating plaintiff holistically  
15 until plaintiff met the Cubans/arabs (al-jarboua's).  
16 8. Hospital records and social service records and State records  
17 and court records DOCUMENT; that, defendant Deborah S. Al-Jarboua  
18 was in continual contact with defendants and that defendant  
19 Brittany moore and her supervisor "Evans" and the James city  
20 county Williamsburg and Envoy of Williamsburg used the 3  
21 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy  
22 McCallup) recommendations to treat and medicate and kill  
23 plaintiff Jerry Theodore McCallup Jr.  
24 9. Defendants Negligence caused another death during the same time  
25 frame, same location, same gender, same age group and under the  
26 same staff. This indicates that Defendant Scarlett Huag is in the  
27 morbid business and not compliance business. Two deaths with in a  
28 week of each other obviously indicate Envoy of Williamsburg is  
into murder.  
10. All Defendants co-conspired to cause Plaintiffs death, even  
after plaintiff informed defendants he didn't take medications.  
11. All Defendants Reckless and wanton conduct caused Plaintiffs  
wrongful death. All plaintiff's medical conditions could be  
treated with diet. Patients with Identical conditions are treated  
with diet ALL OVER THE WORLD.  
12. Defendants of the Adult Protective Services division, abused  
power and co-conspired to cause plaintiff death with (the  
Cubans/Arabs Al-Jarboau's who are unauthorized persons violating  
HIPPA LAWS.  
13. This wrongful death complaint cause of action, civil complaint  
has caused a. sorrow, b. mental anguish, c. loss of companionship  
and d. business partnership.  
14. Plaintiff seeks Compensation for reasonably expected loss  
income from loss of business provided by the decedent.  
15. Plaintiff seeks Expenses for the care and treatment and  
hospitalization of the decedent resulting in death and return of

1 all expenses paid for unauthorized treatments and  
2 hospitalization.  
3 16. Plaintiff seeks Funeral expenses and burial expenses because  
4 the cremation is in a bottle on the table.  
5 17. Plaintiff seeks Punitive Damages  
6 18. Plaintiff seeks compensatory damages  
7 19. Dr. Veronica McCallup DSc is Plaintiff Administrator and  
8 Executor and is also Plaintiffs Beneficiary and Power of attorney  
9 and Medical Power of Attorney. However, was not ever contacted,  
10 called, emailed, found on facebook nor any other social media in  
11 violation of due process. And seek awards of all damages within  
12 this complaint.  
13 20. The state last inspection on this facility was July 2018 and  
14 no further check ups were made. The state found serious  
15 violations at that time, that were not ever corrected. The county  
16 should have been aware of these violations and should never have  
17 placed the plaintiff there, nor should Jerry Theodore McCallup  
18 Jr. have been placed in any hospital. His Doctor sister could  
19 have taken him home or to a better care facility.  
20 21. Nor should defendants send any person to these violating  
21 defendants for any care, hospice care or post care of any kind.  
22 The State should care about seniors and not conspire in senior  
23 abuse, elder abuse and violation to medicare medicade spending,  
24 medicade.  
25 22. The Williamsburg Judge is included as a defendant because he  
26 knew all parties wasn't served/found/include. And the Judge  
27 defendant is the only Judge in town and when plaintiff attempted  
28 to file the wrongful death lawsuit in 2019, this Judge would  
return the documents without filing. Plaintiff went to Virginia  
and personally filed the lawsuit and the Judge refused to allow  
plaintiff to file the Lawsuit. Plaintiff a 3<sup>rd</sup> time filed the  
rejected lawsuit and the Judge refused to allow plaintiff to file  
the lawsuit and WOULDN'T tell plaintiff why after 3-4 times.  
23. Wherefore, causing plaintiffs damages, grief, undue  
stressors, emotional distress, fees, fines sabotaging plaintiffs  
statue of limitations, obstructing Justice. And plaintiff is  
entitled to damages demanded herein of \$3,000,000.00 PLUS  
Punitive damages and the courts have held that pro per litigants  
can receive attorney type fees for litigations/working, just like  
in probate matters; the administrator is paid for all hours  
worked on the estate. Plaintiff Dr Veronica McCallup DSc is  
Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of  
attorney and medical Power of Attorney documented with the  
military and other courts in other states including Virginia. No  
court, no hospital, NO action concerning Plaintiff Jerry Theodore  
McCallup JR. can precede without Plaintiff Dr. Veronica McCallup  
DSc.

1 **CLAIM XXIX HIPPA VIOLATIONS Failure to document compliance**

2 **efforts** \$1,500,000.00

3 Defendants: Williamsburg Department of Human Services social  
4 services Division, Envoy of Williamsburg, Scarlett Huang  
5 (compliance officer) Envoy of Williamsburg, Wendy Evans  
6 Williamsburg human services, Brittany Moore, Consulate Heath  
7 Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah  
8 Al-Jarboua, Jeremy Mccallup, Jeremy McCallup Wife, Fahad Al-  
9 Jarboua, County of James city county, Brain L. Stevenson Jr  
10 1. Plaintiff re-affirms all the aforesaid herein and state:  
11 2. Plaintiff Jerry Theodore McCallup Jr repeatedly requested  
12 sister, Dr. Veronica McCallup DSc and defendants refused to  
13 locate plaintiff. (Beneficiary, Power of Attorney, Medical Power  
14 of Attorney). He would have moved in with his sister.  
15 3. Plaintiffs are Native American Indians who have been to college  
16 and Universities exceeding associate degrees in Science  
17 Technology and Medicine. Plaintiffs had a business together that  
18 they ran from Detroit Michigan. Chicago, IL, California, and  
19 Texas. Plaintiff CTI Chemicals and Allied Products, Inc. The  
20 killing, poisoning, hindering, blocking of plaintiffs contact  
21 with sister and business, obstruction, Interference was malicious  
22 and intentional, willful and wonton.  
23 4. Defendants Never had Jurisdiction to place plaintiff under  
24 ADULT PROTECTIVE SERVICES, and defendants never gave notice to  
25 all the family and plaintiffs; that there was court hearings or  
26 to any court hearing or court action. to place plaintiff under  
27 protective services was unlawful and done by NON\_FAMILY MEMBERS  
28 in co-conspiracy with Williamsburg social services and defendant  
Britany Moore. under these deprival of rights and lack of due  
process; plaintiff died and defendants basically KIDNAPPED  
plaintiff and forced death upon Plaintiff. The (Al-Jarboua's are  
NOT family members. The Cubans and Arabs are NOT family members,  
they pretended to be plaintiff "wife" (x-wife, plaintiff WASN'T  
married) and plaintiff son in Colorado (plaintiff son in Colorado  
wasn't in Virginia)). Jeremy McCallup was a married man and  
caused Jerry Theodore McCallup Jr williamsbug house to go into  
foreclosure by deception. (the bills were paid, everything was  
taken care of,...) Plaintiff Jerry Theodore McCallup Jr had a  
monthly income of \$3,400.00-\$4,900.00 and had 20 years of equity  
in the house. Theres no reason to lose the home except Defendant  
Jeremy McCallup , Fahad Al-jarboua and Deborah Al-jarboua scheme.

1 Defendant Jeremy McCallup was 20- 22 years old and had gotten  
2 married and wanted the house.  
3 5.Defendants were discriminating against Plaintiff and forcing  
4 death upon plaintiff; because of his race, creed, nationality and  
culture. On plaintiff birth certificate and death certificate it  
documents that plaintiff is a native American, an Indian.  
Plaintiff health could be treated with diet.  
6. Plaintiffs recently learned that defendants used and allowed  
defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy  
McCallup to pretend to be and to steal the identity of and  
aggravated identity theft, of: plaintiffs: 1. X-wife 2. plaintiff  
son; in order, to locate plaintiff money, insurance policies and  
property.  
7. Plaintiff learned that defendants wanted the plaintiff Jerry  
Theodore McCallup Jr dead/to die; to collect his money, bank  
accounts, insurances, and property and to ensure death, they  
blocked tricked, would not contact, plaintiff Jerry Theodore  
McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a  
medical doctor and who has been treating plaintiff holistically  
until plaintiff met the Cubans/arabs (al-jarboua's).  
8. Hospital records and social service records and State records  
and court records DOCUMENT; that, defendant Deborah S. Al-Jarboua  
was in continual contact with defendants and that defendant  
Brittany moore and her supervisor "Evans" and the James city  
county Williamsburg and Envoy of Williamsburg used the 3  
defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy  
McCallup) recommendations to treat and medicate and kill  
plaintiff Jerry Theodore McCallup Jr.  
9. Defendants Negligence caused another death during the same time  
frame, same location, same gender, same age group and under the  
same staff. This indicates that Defendant Scarlett Huag is in the  
morbid business and not compliance business. Two deaths with in a  
week of each other obviously indicate Envoy of Williamsburg is  
into murder.  
10. All Defendants co-conspired to cause Plaintiffs death, even  
after plaintiff informed defendants he didn't take medications.  
11. All Defendants Reckless and wanton conduct caused Plaintiffs  
wrongful death. All plaintiff's medical conditions could be  
treated with diet. Patients with Identical conditions are treated  
with diet ALL OVER THE WORLD.  
12. Defendants of the Adult Protective Services division, abused  
power and co-conspired to cause plaintiff death with (the  
Cubans/Arabs Al-Jarboau's who are unauthorized persons violating  
HIPPA LAWS.  
13. This wrongful death complaint cause of action, civil complaint  
has caused a. sorrow, b. mental anguish, c. loss of companionship  
and d. business partnership.

1 14. Plaintiff seeks Compensation for reasonably expected loss  
2 income from loss of business provided by the decedent.  
3 15. Plaintiff seeks Expenses for the care and treatment and  
4 hospitalization of the decedent resulting in death and return of  
5 all expenses paid for unauthorized treatments and  
6 hospitalization.  
7 16. Plaintiff seeks Funeral expenses and burial expenses because  
8 the cremation is in a bottle on the table. Plaintiff seeks  
9 Punitive Damages, Plaintiff seeks compensatory damages  
10 17. Dr. Veronica McCallup DSc is Plaintiff Administrator and  
11 Executor and is also Plaintiffs Beneficiary and Power of attorney  
12 and Medical Power of Attorney. However, was not ever contacted,  
13 called, emailed, found on facebook nor any other social media in  
14 violation of due process. And seek awards of all damages within  
15 this complaint.  
16 18. The state last inspection on this facility was July 2018 and  
17 no further check ups were made. The state found serious  
18 violations at that time, that were not ever corrected. The county  
19 should have been aware of these violations and should never have  
20 placed the plaintiff there, nor should Jerry Theodore McCallup  
21 Jr. have been placed in any hospital. His Doctor sister could  
22 have taken him home or to a better care facility.  
23 19. Nor should defendants send any person to these violating  
24 defendants for any care, hospice care or post care of any kind.  
25 The State should care about seniors and not conspire in senior  
26 abuse, elder abuse and violation to medicare medicade spending,  
27 medicade.  
28 20. The Williamsburg Judge is included as a defendant because he  
knew all parties wasn't served/found/include. And the Judge  
defendant is the only Judge in town and when plaintiff attempted  
to file the wrongful death lawsuit in 2019, this Judge would  
return the documents without filing. Plaintiff went to Virginia  
and personally filed the lawsuit and the Judge refused to allow  
plaintiff to file the Lawsuit. Plaintiff a 3<sup>rd</sup> time filed the  
rejected lawsuit and the Judge refused to allow plaintiff to file  
the lawsuit and WOULDN'T tell plaintiff why after 3-4 times.  
21. Wherefore, causing plaintiffs damages, grief, undue stressors,  
22 emotional distress, fees, fines sabotaging plaintiffs statue of  
23 limitations, obstructing Justice. And plaintiff is entitled to  
24 damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
25 and the courts have held that pro per litigants can receive  
26 attorney type fees for litigations/working, just like in probate  
27 matters; the administrator is paid for all hours worked on the  
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
Theodore McCallup JR Beneficiary and Power of attorney and  
medical Power of Attorney documented with the military and other  
courts in other states including Virginia. No court, no hospital,

1 NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
2 precede without Plaintiff Dr. Veronica McCallup DSc.

3 **CLAIM XXX MEDICAL MALPRACTICE**

4 Defendants: ALL doctors on records \$3,000,000.00 in discovery,  
5 Envoy of Williamsburg, Williamsburg Department of Human Services  
6 social services Division , Scarlett Huang (compliance officer),  
7 Wendy Evans Williamsburg human services, Brittany Moore,  
8 Consulate Heath Care, Sentara Health Care, Jerry Theodore  
9 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup  
10 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city  
11 county, Brain L. Stevenson Jr

12 1. Plaintiff re-affirms all the aforesaid herein and state:

13 2. Wrongful Death This Civil action and Complaint is for  
14 damages sustained by plaintiff(s) for the malicious and  
15 intentional actions and wrongful death caused by defendants,  
16 they have cause the wrongful death of plaintiff using  
17 trickery, theft of identification, deprival of medical care  
18 . VA 8.01 -50 VA 8.01 - 244 1977 c.617, 1958 c 470, 1981 c  
19 115, 2012 c 725 Shepard v. Capitol Foundry of Va., 262 Va.  
20 715, 718-719 (Va. 2001)

21 3. Deprival of Medical Care and medical care in another State

22 4. Several HIPAA violations which are failure to comply with any  
23 aspect of HIPAA standards and provisions detailed in detailed  
24 in 45 CFR Parts 160, 162, and 164.

25 5. Defendants Administered contraindicated medicines to  
26 plaintiff Jerry Theodore McCallup Jr, that caused him seizures  
27 and brain injury , Renal Failure, and death; against plaintiffs  
28 continual complaints that those medicines being  
contraindicative to him. This is proven by the defendants  
illegally having to forcibly get an illegal court order and  
forcibly administer contraindicated drugs before and after  
February 2019 and defendants continually forcing medicines on  
Plaintiff through and including February 2019 until about March  
2, 2019 when plaintiff died from the prior times of forced  
drugging. Plaintiff is a retired military vet that didn't have  
any medical problems that would cause death. The defendant had  
been an athlete all his life and father was a professional

1        athlete and sister an athlete. Athletics and health conscience  
2        is a family trait.

3        6. Wherefore, causing plaintiffs damages, grief, undue stressors,  
4        emotional distress, fees, fines sabotaging plaintiffs statue of  
5        limitations, obstructing Justice. And plaintiff is entitled to  
6        damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
7        and the courts have held that pro per litigants can receive  
8        attorney type fees for litigations/working, just like in probate  
9        matters; the administrator is paid for all hours worked on the  
10        estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
11        Theodore McCallup JR Beneficiary and Power of attorney and  
12        medical Power of Attorney documented with the military and other  
13        courts in other states including Virginia. No court, no hospital,  
14        NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
15        precede without Plaintiff Dr. Veronica McCallup DSc.

16        **CLAIM XXXI NEGLIGENCE** Damage Demand \$1,700,000.00

17        Defendants: Williamsburg Department of Human Services social  
18        services Division, Scarlett Huang (compliance officer), Envoy of  
19        Williamsburg, Scarlett Huang (compliance officer), Envoy of  
20        Williamsburg, Wendy Evans Williamsburg human services, Brittany  
21        Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
22        McCallup III, Deborah Al-Jarboua, Jeremy Mccallup  
23        Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city  
24        county , Brain L. Stevenson Jr

25        1. Plaintiff re-affirms all the aforesaid herein and state:  
26        2. Wherefore, causing plaintiffs damages, grief, undue  
27        stressors, emotional distress, fees, fines sabotaging  
28        plaintiffs statue of limitations, obstructing Justice. And  
      plaintiff is entitled to damages demanded herein of  
      \$3,000,000.00 PLUS Punitive damages and the courts have held  
      that pro per litigants can receive attorney type fees for  
      litigations/working, just like in probate matters; the  
      administrator is paid for all hours worked on the  
      estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's  
      Jerry Theodore McCallup JR Beneficiary and Power of attorney  
      and medical Power of Attorney documented with the military  
      and other courts in other states including Virginia. No  
      court, no hospital, NO action concerning Plaintiff Jerry  
      Theodore McCallup JR. can precede without Plaintiff Dr.  
      Veronica McCallup DSc.

1 **CLAIM XXXII RECKLESSNESS** Damage Demand \$1,700,000.00

2 Defendants: Williamsburg Department of Human Services social  
3 services Division, Scarlett Huang (compliance officer), Envoy of  
4 Williamsburg, Department of Human Services social services  
5 Division, Scarlett Huang (compliance officer) Envoy of  
6 Williamsburg, Wendy Evans Williamsburg human services, Brittany  
7 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
8 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, County of  
9 James city county Jeremy McCallup Wife, Fahad Al-Jarboua, Brain  
10 L. Stevenson Jr

11 1. Plaintiff re-affirms all the aforesaid herein and state:

12 2. The acts of defendants are careless reckless unwarranted,  
13 wanton and intentional. To get a court order is intentional act  
14 of aggression against plaintiff's rights.

15 3. Plaintiff Jerry Theodore McCallup Jr repeatedly requested  
16 sister, Dr. Veronica McCallup DSc and defendants refused to  
17 locate plaintiff. (Beneficiary, Power of Attorney, Medical  
18 Power of Attorney). He would have moved in with his sister.

19 4. Plaintiffs are Native American Indians who have been to  
20 college and Universities exceeding associate degrees in Science  
21 Technology and Medicine. Plaintiffs had a business together  
22 that they ran from Detroit Michigan. Chicago, IL, California,  
23 and Texas. Plaintiff CTI Chemicals and Allied Products, Inc.  
24 The killing, poisoning, hindering, blocking of plaintiffs  
25 contact with sister and business, obstruction, Interference was  
26 malicious and intentional, willful and wonton.

27 5. Defendants Never had Jurisdiction to place plaintiff under  
28 ADULT PROTECTIVE SERVICES, and defendants never gave notice to  
all the family and plaintiffs; that there was court hearings or  
to any court hearing or court action. to place plaintiff under  
protective services was unlawful and done by NON\_FAMILY MEMBERS  
in co-conspiracy with Williamsburg social services and  
defendant Britany Moore. under these deprival of rights and  
lack of due process; plaintiff died and defendants basically  
KIDNAPPED plaintiff and forced death upon Plaintiff. The (Al-  
Jarboua's are NOT family members. The Cubans and Arabs are NOT  
family members, they pretended to be plaintiff "wife" (x-wife,  
plaintiff WASN'T married) and plaintiff son in Colorado  
(plaintiff son in Colorado wasn't in Virginia)). Jeremy  
McCallup was a married man and caused Jerry Theodore McCallup

1 Jr williamsbug house to go into forclosure by deception. (the  
2 bills were paid, everything was taken care of,...) Plaintiff  
3 Jerry Theodore McCallup Jr had a monthly income of \$3,400.00-  
4 \$4,900.00 and had 20 years of equity in the house. Theres no  
5 reason to lose the home except Defendant Jeremy McCallup ,  
6 Fahad Al-jarboua and Deborah Al-jarboua scheme. Defendant  
7 Jeremy McCallup was 20- 22 years old and had gotten married and  
8 wanted the house.

9 6.Defendants were discriminating against Plaintiff and forcing  
10 death upon plaintiff; because of his race, creed, nationality  
11 and culture. On plaintiff birth certificate and death  
12 certificate it documents that plaintiff is a native American,  
13 an Indian. Plaintiff health could be treated with diet.

14 7.Plaaintiffs recently learned that defendants used and allowed  
15 defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy  
16 McCallup to pretend to be and to steal the identity of and  
17 aggravated identity theft, of: plaintiffs: 1. X-wife 2.  
18 plaintiff son; in order, to locate plaintiff money, insurance  
19 policies and property.

20 8.Plaaintiff learned that defendants wanted the plaintiff Jerry  
21 Theodore McCallup Jr dead/to die; to collect his money, bank  
22 accounts, insurances, and property and to ensure death, they  
23 blocked tricked, would not contact, plaintiff Jerry Theodore  
24 McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a  
25 medical doctor and who has been treating plaintiff holistically  
26 until plaintiff met the Cubans/arabs (al-jarboua's).

27 9.Hospital records and social service records and State records  
28 and court records DOCUMENT; that, defendant Deborah S. Al-  
Jarboua was in continual contact with defendants and that  
defendant Brittany moore and her supervisor "Evans" and the  
James city county Williamsburg and Envoy of Williamsburg used  
the 3 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy  
McCallup) recommendations to treat and medicate and kill  
plaintiff Jerry Theodore McCallup Jr.

10. Defendants Negligence caused another death during the same  
time frame, same location, same gender, same age group and  
under the same staff. This indicates that Defendant Scarlett  
Huag is in the morbid business and not compliance business. Two  
deaths with in a week of each other obviously indicate Envoy of  
Williamsburg is into murder.

11.All Defendants co-conspired to cause Plaintiffs death, even  
after plaintiff informed defendants he didn't take medications.

12.All Defendants Reckless and wanton conduct caused Plaintiffs  
wrongful death. All plaintiff's medical conditions could be  
treated with diet. Patients with Identical conditions are  
treated with diet ALL OVER THE WORLD.

1       13. Defendants of the Adult Protective Services division, abused  
2       power and co-conspired to cause plaintiff death with (the  
3       Cubans/Arabs Al-Jarboau's who are unauthorized persons  
4       violating HIPPA LAWS.  
5       14. This wrongful death complaint cause of action, civil  
6       complaint has caused a. sorrow, b. mental anguish, c. loss of  
7       companionship and d. business partnership.  
8       15. Plaintiff seeks Compensation for reasonably expected loss  
9       income from loss of business provided by the decedent.  
10      16. Plaintiff seeks Expenses for the care and treatment and  
11      hospitalization of the decedent resulting in death and return  
12      of all expenses paid for unauthorized treatments and  
13      hospitalization.  
14      17. Plaintiff seeks Funeral expenses and burial expenses because  
15      the cremation is in a bottle on the table.  
16      18. Plaintiff seeks Punitive Damages, Plaintiff seeks  
17      compensatory damages  
18      19. Plaintiff Dr. Veronica McCallup DSc is Plaintiff  
19      Administrator and Executor and is also Plaintiffs Beneficiary  
20      and Power of attorney and Medical Power of Attorney. However,  
21      was not ever contacted, called, emailed, found on facebook nor  
22      any other social media in violation of due process. And seek  
23      awards of all damages within this complaint.  
24      20. The state last inspection on this facility was July 2018 and  
25      no further check ups were made. The state found serious  
26      violations at that time, that were not ever corrected. The  
27      county should have been aware of these violations and should  
28      never have placed the plaintiff there, nor should Jerry  
     Theodore McCallup Jr. have been placed in any hospital. His  
     Doctor sister could have taken him home or to a better care  
     facility.  
     21. Nor should defendants send any person to these violating  
     defendants for any care, hospice care or post care of any kind.  
     The State should care about seniors and not conspire in senior  
     abuse, elder abuse and violation to medicare medicade spending,  
     medicade.  
     22. The Williamsburg Judge is included as a defendant because he  
     knew all parties wasn't served/found/include. And the Judge  
     defendant is the only Judge in town and when plaintiff attempted  
     to file the wrongful death lawsuit in 2019, this Judge would  
     return the documents without filing. Plaintiff went to Virginia  
     and personally filed the lawsuit and the Judge refused to allow  
     plaintiff to file the Lawsuit. Plaintiff a 3<sup>rd</sup> time filed the  
     rejected lawsuit and the Judge refused to allow plaintiff to file  
     the lawsuit and WOULDN'T tell plaintiff why after 3-4 times.  
     23. AS a Result of these defendants actions Defendant(s) Caused  
                 the Death of Jerry Theodore McCallup Jr. and plaintiff seek

1 the said damages. Wherefore, causing plaintiffs damages,  
2 grief, undue stressors, emotional distress, fees, fines  
3 sabotaging plaintiffs statue of limitations, obstructing  
4 Justice. And plaintiff is entitled to damages demanded  
5 herein of \$3,000,000.00 PLUS Punitive damages and the courts  
6 have held that pro per litigants can receive attorney type  
7 fees for litigations/working, just like in probate matters;  
8 the administrator is paid for all hours worked on the  
9 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's  
10 Jerry Theodore McCallup JR Beneficiary and Power of attorney  
11 and medical Power of Attorney documented with the military  
12 and other courts in other states including Virginia. No  
13 court, no hospital, NO action concerning Plaintiff Jerry  
14 Theodore McCallup JR. can precede without Plaintiff Dr.  
15 Veronica McCallup DSc.

16 **CLAIM XXXIII DISCRIMINATION** Damage Demand \$1,700,000.00

17 Defendants: Williamsburg Department of Human Services social  
18 services Division, Scarlett Huang (compliance officer) Envoy of  
19 Williamsburg, Department of Human Services social services  
20 Division , Scarlett Huang (compliance officer), Envoy of  
21 Williamsburg, Wendy Evans Williamsburg human services, Brittany  
22 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
23 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup Jeremy McCallup  
24 Wife, Fahad Al-Jarboua, County of James city county, Brain L.  
25 Stevenson Jr

26 1. Plaintiff affirms all aforesaid and state:  
27 2. Plaintiff records document Plaintiff as a Native American,  
28 Indian and the prejudices to Native Americans has caused  
sicknesses and death historically.  
3. Wrongful Death due to a preventable medical error and the  
reckless/negligent behavior of defendants.  
4. Wrongful death and Patient Rights  
5. Time after time after time the medical staff failed to  
properly obtain medical care out side of Virginia and give  
Plaintiff Jerry Theodore McCallup Jr, the best care.  
6. Callous indifference to Native Americans.

1 7. Defendants (the Cubans/Arabs) hated Native American Indian  
2 plaintiff Jerry Theodore McCallup Jr and wanted him dead and  
3 would not seek the best recovery nor treatment for Plaintiff.  
4 Plaintiff sister is a Medical doctor living in California and  
5 Plaintiff sister could have moved Brother plaintiff Jerry  
6 Theodore McCallup to hospitals in California, Chicago, Detroit,  
7 Kansas City for better care than Envoy of Williamsburg, VA.  
8 Defendant Envoy of Williamsburg was in major State and Federal  
9 violations through 2018 and 2019 and was shut down after two (2)  
10 law suits were filed against the company. And the state is  
11 include here as a defendant because the defendant State of  
12 Virginia, never return for a compliance check after citing the  
13 defendants Violations in 2018 and thereby the compliance officer  
14 of Envoy is a defendant. Another patient of Defendant Envoy of  
15 Williamsburg died the same week that plaintiff Jerry Theodore  
16 McCallup Jr. died.

17 8. Thereby, Defendants causing undue suffering of Plaintiffs knee  
18 and Religious diet and even allowing plaintiff to meet with the  
19 other Natives in the area. There are 10 Tribes in the area that  
20 would have come to the facility to administer religious rights.

21 9. AS a Result of these defendants actions Defendant(s) Caused  
22 the Death of Jerry Theodore McCallup Jr. and plaintiff seek the  
23 said damages. Wherefore, causing plaintiffs damages, grief,  
24 undue stressors, emotional distress, fees, fines sabotaging  
25 plaintiffs statue of limitations, obstructing Justice. And  
26 plaintiff is entitled to damages demanded herein of  
27 \$3,000,000.00 PLUS Punitive damages and the courts have held  
28 that pro per litigants can receive attorney type fees for  
litigations/working, just like in probate matters; the  
administrator is paid for all hours worked on the  
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
Theodore McCallup JR Beneficiary and Power of attorney and  
medical Power of Attorney documented with the military and  
other courts in other states including Virginia. No court, no  
hospital, NO action concerning Plaintiff Jerry Theodore  
McCallup JR. can precede without Plaintiff Dr. Veronica  
McCallup DSc.

29 **CLAIM XXXIV CONSPIRACY** Damage Demand \$3,000,000.00  
30 Defendants: Williamsburg Department of Human Services social  
31 services Division, Scarlett Huang (compliance officer) Envoy of  
32 Williamsburg, Department of Human Services social services  
33 Division , Scarlett Huang (compliance officer) Envoy of  
34 Williamsburg, Wendy Evans Williamsburg human services, Brittany

1 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
2 McCallup III, Deborah Al-Jarboua, Jeremy McCallup  
3 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city  
4 county

5 1. Plaintiff affirms all aforesaid and state: That defendants  
6 know one another and often work together to control a person  
7 and situation according to their ideologies.  
8 3. Plaintiff further supports the theory that plaintiff knew  
9 defendants were trying to rob him/swindle him about 2014.  
10 Plaintiff tried to separate from the Cuban/Arab defendants  
11 and plaintiff \$350,000 home entered foreclosure after owning  
12 the home and another house and properties over twenty (20)  
13 years.  
14 4. Plaintiff believes these defendants had been poisoning  
15 plaintiff in the home; prior to any medical conditions and  
16 rush to have plaintiff cremated before plaintiff family  
17 learned of plaintiffs death. Plaintiff had enough money for  
18 burial and plaintiff family is against cremations.  
19 5. AS a Result of these defendants actions Defendant(s) Caused  
20 the Death of Jerry Theodore McCallup Jr. and plaintiff seek  
21 the said damages. Wherefore, causing plaintiffs damages,  
22 grief, undue stressors, emotional distress, fees, fines  
23 sabotaging plaintiffs statue of limitations, obstructing  
24 Justice. And plaintiff is entitled to damages demanded  
herein of \$3,000,000.00 PLUS Punitive damages and the courts  
have held that pro per litigants can receive attorney type  
fees for litigations/working, just like in probate matters;  
the administrator is paid for all hours worked on the  
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's  
Jerry Theodore McCallup JR Beneficiary and Power of attorney  
and medical Power of Attorney documented with the military  
and other courts in other states including Virginia. No  
court, no hospital, NO action concerning Plaintiff Jerry  
Theodore McCallup JR. can precede without Plaintiff Dr.  
Veronica McCallup DSc.

25 **CLAIM XXXV RICO CORRUPTION** Damage Demand **three times complaint**  
26 Defendants: Williamsburg Department of Human Services social  
27 services Division , Scarlett Huang (compliance officer) Envoy of  
28 Williamsburg, Wendy Evans Williamsburg human services, Brittany

1 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
2 McCallup III, Deborah Al-Jarboua, Jeremy McCallup  
3 Jeremy McCallup Wife, Fahad Al-Jarboua Scarlett Huang (compliance  
4 officer), Envoy of Williamsburg, County of James city county

5 1. Plaintiff affirms all aforesaid and state:

6 2. The Racketeer Influenced and Corrupt

7 Organizations (RICO) Act is a United States federal law that  
8 provides for extended criminal penalties and a civil cause of  
9 action for acts performed as part of an ongoing criminal  
10 organization. The RICO Act focuses specifically  
11 on racketeering and allows the *leaders* of a syndicate to be  
12 tried for the crimes they *ordered* others to do or assisted them  
13 in doing, closing a perceived loophole that allowed a person  
14 who instructed someone else to, for example, murder, to be  
15 exempt from the trial because they did not actually commit the  
16 crime personally

17 3. RICO also permits a private individual "damaged in his  
18 business or property" by a "racketeer" to file a civil suit.  
19 The plaintiff must prove the existence of an "enterprise". The  
20 defendant(s) are not the enterprise; in other words, the  
21 defendant(s) and the enterprise are not one and the same. There  
22 must be one of four specified relationships between the  
23 defendant(s) and the enterprise: either the defendant(s)  
24 invested the proceeds of the pattern of racketeering activity  
25 into the enterprise (18 U.S.C. § 1962(a)); or the defendant(s)  
26 acquired or maintained an interest in, or control of, the  
27 enterprise through the pattern of racketeering activity  
28 (subsection (b)); or the defendant(s) conducted or participated  
in the affairs of the enterprise "through" the pattern of  
racketeering activity (subsection (c)); or the defendant(s)  
conspired to do one of the above (subsection (d)). In essence,

1 the enterprise is either the 'prize,' 'instrument,' 'victim,'  
2 or 'perpetrator' of the racketeers.

3 6. Defendants Deborah Al-Jarboau (the Cubans/Arabs) hated  
4 Native American Indian plaintiff Jerry Theodore McCallup Jr  
and wanted him dead and would not seek the best recovery nor  
treatment for Plaintiff.

5 7. Defendant Deborah Al-Jarboua sought men to pay her and her  
6 Cuban family way in America and finance her and Cuban family  
in America.

7 8. Defendant Deborah Al-Jarboua is "SERIAL"; like a serial  
8 killer. Men run from her when they figure her out, Her mode  
9 of action is: foreign men/ Native American men. She cries  
9 wolf. They feel sorry for her, she moves in. She gets  
10 pregnant. She attempts to kill them/mame them/ incapacitate  
them/poison them/put "something in their food".

10 9. Defendant Deborah Al-Jarboua enterprise consisted of  
11 marrying these non-american men and living with these men.  
12 First was the arab guy "al-jarboua" who she had a child by.  
13 When he determined that she was for money , he took the  
14 child (defendant Fahad Al-jarboua) and he left the  
country/America with the child.

14 10. Some how defendant Deborah Al-Jarboua was able to use a  
15 Cuban santerian spell on Plaintiff Jerry Theodore McCallup  
16 JR and suckered him into Going to Arabia and retrieving  
17 defendant Fahad Al-Jarboua. Plaintiff Jerry Theodore  
18 McCallup JR began having medical problems after that.

18 11. Plaintiff Dr. Veronica McCallup DSC began treating  
19 plaintiff Jerry Theodore McCallup JR and he distanced  
20 himself from the Cuban woman defendant Deborah Al-Jarboua.

20 12. Plaintiff sister is a Medical doctor living in  
21 California and Plaintiff sister could have moved Brother  
22 plaintiff Jerry Theodore McCallup to hospitals in  
23 California, Chicago, Detroit, Kansas City for better care  
24 than Envoy of Williamsburg, VA.

24 13. Defendant Envoy of Williamsburg was in major State and  
25 Federal violations through 2018 and 2019 and was shut down  
26 after two (2) law suits were filed against the company. And  
27 the state is include here as a defendant because the  
28 defendant State of Virginia, never return for a compliance  
check after citing the defendants Violations in 2018 and  
thereby the compliance officer of Envoy is a defendant.  
Another patient of Defendant Envoy of Williamsburg died the  
same week that plaintiff Jerry Theodore McCallup Jr. died.

14. Defendants Brittany Moore, the Williamsburg human  
28 services and the city of Williamsburg and county of James

1 county Virginia obviously had to agree to obtain a court  
2 order without plaintiff's power of attorney and medical  
3 power of attorney.

4 15. Defendants Brittany Moore and the Williamsburg human  
5 services and the city of Williamsburg and county of James  
6 County Virginia obviously had to co-conspire with the  
7 hospitals involved, to place plaintiff in their facilities  
8 and thereafter, placed into ENVOY of Williamsburg who should  
9 have been shut down by the state of Virginia for all the  
10 serious violations, determined by the state of Virginia. So  
11 knowingly, these defendants are endangering seniors,  
12 plaintiff that has resulted in death. Wrongful Death This  
13 Civil action and Complaint is for damages sustained by  
14 plaintiff(s) for the malicious and intentional actions and  
15 wrongful death caused by defendants, they have cause the  
16 wrongful death of plaintiff using trickery, theft of  
17 identification, deprival of medical care . VA 8.01 -50 VA  
18 8.01 - 244 1977 c.617, 1958 c 470, 1981 c 115, 2012 c 725  
19 Shepard v. Capitol Foundry of Va., 262 Va. 715, 718-719 (Va.  
20 2001)

21 16. Deprival of Medical Care and medical care in another  
22 State

23 17. Defendants Administered contraindicated medicines to  
24 plaintiff Jerry Theodore McCallup Jr, that caused him  
25 seizures and brain injury , Renal Failure, and death;  
26 against plaintiffs continual complaints that those medicines  
27 being contraindicated to him. This is proven by the  
28 defendants illegally having to forcibly get an illegal court  
order and forcibly administer contraindicated drugs before  
and after February 2019 and defendants continually forcing  
medicines on Plaintiff through and including February 2019  
until about March 2, 2019 when plaintiff died from the prior  
times of forced drugging. Plaintiff is a retired military  
vet that didn't have any medical problems that would cause  
death. The defendant had been an athlete all his life and  
father was a professional athlete and sister an athlete.  
Athletics and health conscience is a family trait.

29 18. AS a Result of these defendants actions Defendant(s)  
30 Caused the Death of Jerry Theodore McCallup Jr. and  
31 plaintiff seek the said damages. Wherefore, causing  
32 plaintiffs damages, grief, undue stressors, emotional  
33 distress, fees, fines sabotaging plaintiffs statue of  
34 limitations, obstructing Justice. And plaintiff is entitled  
35 to damages demanded herein of \$3,000,000.00 PLUS Punitive  
36 damages and the courts have held that pro per litigants can  
37 receive attorney type fees for litigations/working, just

1 like in probate matters; the administrator is paid for all  
2 hours worked on the estate. Plaintiff Dr Veronica McCallup  
3 DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary  
4 and Power of attorney and medical Power of Attorney  
documented with the military and other courts in other  
states including Virginia. No court, no hospital, NO action  
concerning Plaintiff Jerry Theodore McCallup JR. can precede  
5 without Plaintiff Dr. Veronica McCallup DSc.  
6

7 **CLAIM XXXVI LOSS OF INCOME** Damage Demand \$13,000,000.00  
8 Defendants: Williamsburg Department of Human Services social  
9 services Division, Scarlett Huang (compliance officer) Envoy of  
10 Williamsburg, Department of Human Services social services  
Division , Scarlett Huang (compliance officer) Envoy of  
11 Williamsburg, Wendy Evans Williamsburg human services, Brittany  
12 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
13 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup  
14 Jeremy McCallup Wife, Fahad Al-Jarboua , County of James city  
15 county

16 1. Plaintiff affirms all aforesaid and state:  
17 2. That Plaintiff and his Sister; Dr. Veronica McCallup DSc ran  
18 a business together called CTI Chemicals and Allied Products,  
Inc out of Chicago IL and CTI, Inc out of Detroit Michigan.  
19 3. Plaintiff was in contact with military friends and family  
members in many fields and locations, they would send  
21 perspective contracts to plaintiff who would evaluate them and  
22 His sister would create the plan to fulfill the contracts.  
23 4. Plaintiff Jerry Theodore McCallup Jr repeatedly requested  
sister, Dr. Veronica McCallup DSc and defendants refused to  
24 locate plaintiff. (Beneficiary, Power of Attorney, Medical  
Power of Attorney). He would have moved in with his sister.  
25 5. Plaintiffs are Native American Indians who have been to  
college and Universities exceeding associate degrees in Science  
Technology and Medicine. Plaintiffs had a business together  
27 that they ran from Detroit Michigan. Chicago, IL, California,  
and Texas. Plaintiff CTI Chemicals and Allied Products, Inc.  
28 The killing, poisoning, hindering, blocking of plaintiffs

1 contact with sister and business, obstruction, Interference was  
2 malicious and intentional, willful and wonton.

3 6. Defendants Never had Jurisdiction to place plaintiff under  
4 ADULT PROTECTIVE SERVICES, and defendants never gave notice to  
5 all the family and plaintiffs; that there was court hearings or  
6 to any court hearing or court action. to place plaintiff under  
7 protective services was unlawful and done by NON\_FAMILY MEMBERS  
8 in co-conspiracy with Williamsburg social services and  
9 defendant Britany Moore. under these deprival of rights and  
10 lack of due process; plaintiff died and defendants basically  
11 KIDNAPPED plaintiff and forced death upon Plaintiff. The (Al-  
12 Jarboua's are NOT family members. The Cubans and Arabs are NOT  
13 family members, they pretended to be plaintiff "wife" (x-wife,  
14 plaintiff WASN'T married) and plaintiff son in Colorado  
15 (plaintiff son in Colorado wasn't in Virginia)). Jeremy  
16 McCallup was a married man and caused Jerry Theodore McCallup  
17 Jr williamsbug house to go into forclosure by deception. (the  
18 bills were paid, everything was taken care of,...) Plaintiff  
19 Jerry Theodore McCallup Jr had a monthly income of \$3,400.00-  
20 \$4,900.00 and had 20 years of equity in the house. Theres no  
21 reason to lose the home except Defendant Jeremy McCallup ,  
22 Fahad Al-jarboua and Deborah Al-jarboua scheme. Defendant  
23 Jeremy McCallup was 20- 22 years old and had gotten married and  
24 wanted the house.

25 6. Defendants were discriminating against Plaintiff and forcing  
26 death upon plaintiff; because of his race, creed, nationality  
27 and culture. On plaintiff birth certificate and death  
28 certificate it documents that plaintiff is a native American,  
an Indian. Plaintiff health could be treated with diet.

7. Plaintiffs recently learned that defendants used and allowed  
defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy  
McCallup to pretend to be and to steal the identity of and  
aggravated identity theft, of: plaintiffs: 1. X-wife 2.  
plaintiff son; in order, to locate plaintiff money, insurance  
policies and property.

8. Plaintiff learned that defendants wanted the plaintiff Jerry  
Theodore McCallup Jr dead/to die; to collect his money, bank  
accounts, insurances, and property and to ensure death, they  
blocked tricked, would not contact, plaintiff Jerry Theodore  
McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a  
medical doctor and who has been treating plaintiff holistically  
until plaintiff met the Cubans/arabs (al-jarboua's).

9. Hospital records and social service records and State records  
and court records DOCUMENT; that, defendant Deborah S. Al-  
Jarboua was in continual contact with defendants and that  
defendant Brittany moore and her supervisor "Evans" and the  
James city county Williamsburg and Envoy of Williamsburg used

1 the 3 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy  
2 McCallup) recommendations to treat and medicate and kill  
3 plaintiff Jerry Theodore McCallup Jr.

4 10. Defendants Negligence caused another death during the same  
5 time frame, same location, same gender, same age group and  
6 under the same staff. This indicates that Defendant Scarlett  
7 Huag is in the morbid business and not compliance business. Two  
8 deaths within a week of each other obviously indicate Envoy of  
9 Williamsburg is into murder.

10 11. All Defendants co-conspired to cause Plaintiffs death, even  
11 after plaintiff informed defendants he didn't take medications.

12 12. All Defendants Reckless and wanton conduct caused Plaintiffs  
13 wrongful death. All plaintiff's medical conditions could be  
14 treated with diet. Patients with Identical conditions are  
15 treated with diet ALL OVER THE WORLD.

16 13. Defendants of the Adult Protective Services division, abused  
17 power and co-conspired to cause plaintiff death with (the  
18 Cubans/Arabs Al-Jarboau's who are unauthorized persons  
19 violating HIPPA LAWS.

20 14. This wrongful death complaint cause of action, civil  
21 complaint has caused a. sorrow, b. mental anguish, c. loss of  
22 companionship and d. business partnership.

23 15. Plaintiff seeks Compensation for reasonably expected loss  
24 income from loss of business provided by the decedent.

25 16. Plaintiff seeks Expenses for the care and treatment and  
26 hospitalization of the decedent resulting in death and return  
27 of all expenses paid for unauthorized treatments and  
28 hospitalization.

17. Plaintiff seeks Funeral expenses and burial expenses because  
the cremation is in a bottle on the table.

18. Plaintiff seeks Punitive Damages

19. Plaintiff seeks compensatory damages

20. Dr. Veronica McCallup DSc is Plaintiff Administrator and  
21 Executor and is also Plaintiffs Beneficiary and Power of  
22 attorney and Medical Power of Attorney. However, was not ever  
23 contacted, called, emailed, found on facebook nor any other  
social media in violation of due process. And seek awards of  
all damages within this complaint.

24. The state last inspection on this facility was July 2018 and  
no further check ups were made. The state found serious  
25 violations at that time, that were not ever corrected. The  
26 county should have been aware of these violations and should  
27 never have placed the plaintiff there, nor should Jerry  
28 Theodore McCallup Jr. have been placed in any hospital. His  
Doctor sister could have taken him home or to a better care  
facility.

1       22. Nor should defendants send any person to these violating  
2       defendants for any care, hospice care or post care of any kind.  
3       The State should care about seniors and not conspire in senior  
4       abuse, elder abuse and violation to medicare medicade spending,  
5       medicade.

6       23. The Williamsburg Judge is included as a defendant because he  
7       knew all parties wasn't served/found/include. And the Judge  
8       defendant is the only Judge in town and when plaintiff  
9       attempted to file the wrongful death lawsuit in 2019, this  
10      Judge would return the documents without filing. Plaintiff went  
11      to Virginia and personally filed the lawsuit and the Judge  
12      refused to allow plaintiff to file the Lawsuit. Plaintiff a 3<sup>rd</sup>  
13      time filed the rejected lawsuit and the Judge refused to allow  
14      plaintiff to file the lawsuit and WOULDN'T tell plaintiff why  
15      after 3-4 times.

16      24. AS a Result of these defendants actions Defendant(s) Caused  
17      loss of contracts by and through the Death of Jerry Theodore  
18      McCallup Jr. and plaintiff seek the said damages. Wherefore,  
19      causing plaintiffs damages, grief, undue stressors, emotional  
20      distress, fees, fines sabotaging plaintiffs statue of  
21      limitations, obstructing Justice. And plaintiff is entitled to  
22      damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
23      and the courts have held that pro per litigants can receive  
24      attorney type fees for litigations/working, just like in probate  
25      matters; the administrator is paid for all hours worked on the  
26      estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
27      Theodore McCallup JR Beneficiary and Power of attorney and  
28      medical Power of Attorney documented with the military and other  
      courts in other states including Virginia. No court, no hospital,  
      NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
      precede without Plaintiff Dr. Veronica McCallup DSc.

20  
21      **CLAIM XXXVII VIOLATION OF RELIGIOUS PRACTICES** Damage Demand

22      \$3,000,000.00

23      Defendants: Williamsburg Department of Human Services social  
24      services Division, Scarlett Huang (compliance officer), Envoy of  
25      Williamsburg, Wendy Evans Williamsburg human services, Brittany  
26      Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
27      McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, County of  
28      James city county, Jeremy McCallup Wife, Fahad Al-Jarboua,

1       1. Plaintiff affirms all aforesaid and state: Defendants knew  
2           from medical records that Plaintiff was a native Indian and  
3           required religious freedoms and dietary rights.  
4       2. The depriving plaintiff the right to refuse a pill is denying  
5           rights.  
6       3. Plaintiff further supports the theory that plaintiff knew  
7           defendants were trying to rob him/swindle him about 2014.  
8           Plaintiff tried to separate from the Cuban/Arab defendants and  
9           plaintiff \$350,000 home entered foreclosure after owning the  
10           home and another house and properties over twenty (20) years.  
11       4. Plaintiff believes these defendants had been poisoning  
12           plaintiff in the home; prior to any medical conditions and rush  
13           to have plaintiff cremated before plaintiff family learned of  
14           plaintiffs death. Plaintiff had enough money for burial and  
15           plaintiff family is against cremations.  
16       5. To create a court case by the city of Williamsburg and James  
17           city count to kidnap Plaintiff because he exercised his rights  
18           to refuse contra-indicated medicine is cruel and unusual  
19           punishment, its harsh and malicious bullying to show control by  
20           Brittany and her abuse of power and manipulation of the system  
21           to have power over plaintiff. Most women like Plaintiff and  
22           Brittany moore may have been upset that plaintiff refused her  
23           advances.  
24       6. Plaintiff received 3 checks per month thereby he was a good  
25           catch for ENVOY of Williamsburg hospitals and girls and the  
26           reason the Al-Jarboua's wanted his money and him dead to  
27           collect his savings , insurances and properties  
28       7. Plaintiff Jerry Theodore McCallup Jr repeatedly requested  
         sister, Dr. Veronica McCallup DSc and defendants refused to  
         locate plaintiff. (Beneficiary, Power of Attorney, Medical  
         Power of Attorney). He would have moved in with his sister.  
8. Plaintiffs are Native American Indians who have been to  
college and Universities exceeding associate degrees in Science  
Technology and Medicine. Plaintiffs had a business together  
that they ran from Detroit Michigan. Chicago, IL, California,  
and Texas. Plaintiff CTI Chemicals and Allied Products, Inc.  
The killing, poisoning, hindering, blocking of plaintiffs  
contact with sister and business, obstruction, Interference was  
malicious and intentional, willful and wonton.

1 9. Defendants Never had Jurisdiction to place plaintiff under  
2 ADULT PROTECTIVE SERVICES, and defendants never gave notice to  
3 all the family and plaintiffs; that there was court hearings or  
4 to any court hearing or court action. to place plaintiff under  
protective services was unlawful and done by NON\_FAMILY MEMBERS  
in co-conspiracy with Williamsburg social services and  
defendant Britany Moore. under these deprival of rights and  
lack of due process; plaintiff died and defendants basically  
KIDNAPPED plaintiff and forced death upon Plaintiff. The (Al-  
Jarboua's are NOT family members. The Cubans and Arabs are NOT  
family members, they pretended to be plaintiff "wife" (x-wife,  
plaintiff WASN'T married) and plaintiff son in Colorado  
(plaintiff son in Colorado wasn't in Virginia)). Jeremy  
McCallup was a married man and caused Jerry Theodore McCallup  
Jr williamsbug house to go into forclosure by deception. (the  
bills were paid, everything was taken care of,...) Plaintiff  
Jerry Theodore McCallup Jr had a monthly income of \$3,400.00-  
\$4,900.00 and had 20 years of equity in the house. Theres no  
reason to lose the home except Defendant Jeremy McCallup ,  
Fahad Al-jarboua and Deborah Al-jarboua scheme. Defendant  
Jeremy McCallup was 20- 22 years old and had gotten married and  
wanted the house.

14 10. Defendants were discriminating against Plaintiff and forcing  
15 death upon plaintiff; because of his race, creed, nationality  
16 and culture. On plaintiff birth certificate and death  
certificate it documents that plaintiff is a native American,  
an Indian. Plaintiff health could be treated with diet.

17 11. Plaintiffs recently learned that defendants used and allowed  
18 defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy  
19 McCallup to pretend to be and to steal the identity of and  
aggravated identity theft, of: plaintiffs: 1. X-wife 2.  
plaintiff son; in order, to locate plaintiff money, insurance  
20 policies and property.

21 12. Plaintiff learned that defendants wanted the plaintiff Jerry  
Theodore McCallup Jr dead/to die; to collect his money, bank  
22 accounts, insurances, and property and to ensure death, they  
blocked tricked, would not contact, plaintiff Jerry Theodore  
23 McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a  
medical doctor and who has been treating plaintiff holistically  
24 until plaintiff met the Cubans/arabs (al-jarboua's).

25 13. Hospital records and social service records and State  
records and court records DOCUMENT; that, defendant Deborah S.  
26 Al-Jarboua was in continual contact with defendants and that  
defendant Brittany moore and her supervisor "Evans" and the  
27 James city county Williamsburg and Envoy of Williamsburg used  
28 the 3 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy

1       McCallup) recommendations to treat and medicate and kill  
2       plaintiff Jerry Theodore McCallup Jr.

3       14. Defendants Negligence caused another death during the same  
4       time frame, same location, same gender, same age group and  
5       under the same staff. This indicates that Defendant Scarlett  
6       Huag is in the morbid business and not compliance business. Two  
7       deaths with in a week of each other obviously indicate Envoy of  
8       Williamsburg is into murder.

9       15. All Defendants co-conspired to cause Plaintiffs death, even  
10      after plaintiff informed defendants he didn't take medications.

11      16. All Defendants Reckless and wanton conduct caused Plaintiffs  
12      wrongful death. All plaintiff's medical conditions could be  
13      treated with diet. Patients with Identical conditions are  
14      treated with diet ALL OVER THE WORLD.

15      17. Defendants of the Adult Protective Services division, abused  
16      power and co-conspired to cause plaintiff death with (the  
17      Cubans/Arabs Al-Jarboau's who are unauthorized persons  
18      violating HIPPA LAWS.

19      18. This wrongful death complaint cause of action, civil  
20      complaint has caused a. sorrow, b. mental anguish, c. loss of  
21      companionship and d. business partnership.

22      19. Plaintiff seeks Compensation for reasonably expected loss  
23      income from loss of business provided by the decedent.

24      20. Plaintiff seeks Expenses for the care and treatment and  
25      hospitalization of the decedent resulting in death and return  
26      of all expenses paid for unauthorized treatments and  
27      hospitalization.

28      21. Plaintiff seeks Funeral expenses and burial expenses because  
29      the cremation is in a bottle on the table.

30      22. Plaintiff seeks Punitive Damages, Plaintiff seeks  
31      compensatory damages

32      23. Dr. Veronica McCallup DSc is Plaintiff Administrator and  
33      Executor and is also Plaintiffs Beneficiary and Power of  
34      attorney and Medical Power of Attorney. However, was not ever  
35      contacted, called, emailed, found on facebook nor any other  
36      social media in violation of due process. And seek awards of  
37      all damages within this complaint.

38      24. The state last inspection on this facility was July 2018 and  
39      no further check ups were made. The state found serious  
40      violations at that time, that were not ever corrected. The  
41      county should have been aware of these violations and should  
42      never have placed the plaintiff there, nor should Jerry  
43      Theodore McCallup Jr. have been placed in any hospital. His  
44      Doctor sister could have taken him home or to a better care  
45      facility.

46      25. Nor should defendants send any person to these violating  
47      defendants for any care, hospice care or post care of any kind.

1 The State should care about seniors and not conspire in senior  
2 abuse, elder abuse and violation to medicare medicade spending,  
medicade.

3 26.The Williamsburg Judge is included as a defendant because he  
knew all parties wasn't served/found/include. And the Judge  
4 defendant is the only Judge in town and when plaintiff  
attempted to file the wrongful death lawsuit in 2019, this  
5 Judge would return the documents without filing. Plaintiff went  
6 to Virginia and personally filed the lawsuit and the Judge  
refused to allow plaintiff to file the Lawsuit. Plaintiff a 3<sup>rd</sup>  
7 time filed the rejected lawsuit and the Judge refused to allow  
plaintiff to file the lawsuit and WOULDN'T tell plaintiff why  
8 after 3-4 times.

9 27.AS a Result of these defendants actions Defendant(s) Caused  
the Death of Jerry Theodore McCallup Jr. and plaintiff seek the  
10 said damages. Wherefore, causing plaintiffs damages, grief, undue  
stressors, emotional distress, fees, fines sabotaging plaintiffs  
11 statue of limitations, obstructing Justice. And plaintiff is  
entitled to damages demanded herein of \$3,000,000.00 PLUS  
12 Punitive damages and the courts have held that pro per litigants  
13 can receive attorney type fees for litigations/working, just like  
in probate matters; the administrator is paid for all hours  
14 worked on the estate.Plaaintiff Dr Veronica McCallup DSc is  
15 Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of  
attorney and medical Power of Attorney documented with the  
16 military and other courts in other states including Virginia. No  
court, no hospital, NO action concerning Plaintiff Jerry Theodore  
17 McCallup JR. can precede without Plaintiff Dr. Veronica McCallup  
DSc.  
18

19 **CLAIM XXXVIII Wrongful death and survival statute 42 U.S. Code §**

20 **1996 - Protection and preservation.** the policy of the United  
21 States to protect and preserve for American Indians their  
22 inherent right of freedom to believe, express, and exercise the  
23 traditional religions of the American Indian, Eskimo, Aleut,  
and Native Hawaiians, including but not limited to access to  
24 sites, use and possession of sacred objects, and the freedom to  
sites, use and possession of sacred objects, and the freedom to  
25 worship through ceremonials and traditional rites.

26 Damage Demand \$5,000,000.00

27 Defendants: Williamsburg Department of Human Services social  
28 services Division, Scarlett Huang (compliance officer) Envoy of  
Williamsburg, Department of Human Services social services

1 Division , Scarlett Huang (compliance officer) Envoy of  
2 Williamsburg, Wendy Evans Williamsburg human services, Brittany  
3 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
4 McCallup III, Deborah Al-Jarboua, Jeremy McCallup  
5 Jeremy McCallup Wife, Fahad Al-Jarboua , County of James city  
6 county

7 1. Plaintiff re-affirms all the aforesaid herein and state: That  
8 plaintiff Jerry Theodore McCallup JR death certificate is not  
9 signed by a doctor. It doesn't state the cause of death and the  
10 only information on the death certificate is from a slow mentally  
11 incapacitated child. So the cause of death is unknown. That's how  
12 defendants cover up their recklessness, abuse and negligence.

13 2. Defendants (the Cubans/Arabs) hated Native American Indian  
14 plaintiff Jerry Theodore McCallup Jr and wanted him dead and  
15 would not seek the best recovery nor treatment for Plaintiff.  
16 Plaintiff sister is a Medical doctor living in California and  
17 Plaintiff sister could have moved Brother plaintiff Jerry  
18 Theodore McCallup to hospitals in California, Chicago, Detroit,  
19 Kansas City for better care than Envoy of Williamsburg, VA.  
20 Defendant Envoy of Williamsburg was in major State and Federal  
21 violations through 2018 and 2019 and was shut down after two (2)  
22 law suits were filed against the company. And the state is  
23 include here as a defendant because the defendant State of  
24 Virginia, never return for a compliance check after citing the  
25 defendants Violations in 2018 and thereby the compliance officer  
26 of Envoy is a defendant. Another patient of Defendant Envoy of  
27 Williamsburg died the same week that plaintiff Jerry Theodore  
28 McCallup Jr. died.

29 3. Plaintiff Jerry Theodore McCallup Jr repeatedly requested  
30 sister, Dr. Veronica McCallup DSc and defendants refused to  
31 locate plaintiff. (Beneficiary, Power of Attorney, Medical Power  
32 of Attorney). He would have moved in with his sister.

33 4. Plaintiffs are Native American Indians who have been to college  
34 and Universities exceeding associate degrees in Science  
35 Technology and Medicine. Plaintiffs had a business together that  
36 they ran from Detroit Michigan. Chicago, IL, California, and  
37 Texas. Plaintiff CTI Chemicals and Allied Products, Inc. The  
38 killing, poisoning, hindering, blocking of plaintiffs contact  
with sister and business, obstruction, Interference was malicious  
and intentional, willful and wonton.

1 5. Defendants Never had Jurisdiction to place plaintiff under  
2 ADULT PROTECTIVE SERVICES, and defendants never gave notice to  
3 all the family and plaintiffs; that there was court hearings or  
4 to any court hearing or court action. to place plaintiff under  
protective services was unlawful and done by NON\_FAMILY MEMBERS  
5 in co-conspiracy with Williamsburg social services and defendant  
Britany Moore. under these deprival of rights and lack of due  
6 process; plaintiff died and defendants basically KIDNAPPED  
plaintiff and forced death upon Plaintiff. The (Al-Jarboua's are  
7 NOT family members. The Cubans and Arabs are NOT family members,  
8 they pretended to be plaintiff "wife" (x-wife, plaintiff WASN'T  
married) and plaintiff son in Colorado (plaintiff son in Colorado  
wasn't in Virginia)). Jeremy McCallup was a married man and  
9 caused Jerry Theodore McCallup Jr williamsbug house to go into  
foreclosure by deception. (the bills were paid, everything was  
10 taken care of,...) Plaintiff Jerry Theodore McCallup Jr had a  
monthly income of \$3,400.00-\$4,900.00 and had 20 years of equity  
11 in the house. Theres no reason to lose the home except Defendant  
12 Jeremy McCallup , Fahad Al-jarboua and Deborah Al-jarboua scheme.  
Defendant Jeremy McCallup was 20- 22 years old and had gotten  
13 married and wanted the house.

14 6. Defendants were discriminating against Plaintiff and forcing  
death upon plaintiff; because of his race, creed, nationality and  
15 culture. On plaintiff birth certificate and death certificate it  
documents that plaintiff is a native American, an Indian.  
16 Plaintiff health could be treated with diet.

17 7. Plaintiffs recently learned that defendants used and allowed  
defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy  
18 McCallup to pretend to be and to steal the identity of and  
aggravated identity theft, of: plaintiffs: 1. X-wife 2. plaintiff  
19 son; in order, to locate plaintiff money, insurance policies and  
property.

20 8. Plaintiff learned that defendants wanted the plaintiff Jerry  
Theodore McCallup Jr dead/to die; to collect his money, bank  
21 accounts, insurances, and property and to ensure death, they  
blocked tricked, would not contact, plaintiff Jerry Theodore  
22 McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a  
medical doctor and who has been treating plaintiff holistically  
23 until plaintiff met the Cubans/arabs (al-jarboua's).

24 9. Hospital records and social service records and State records  
and court records DOCUMENT; that, defendant Deborah S. Al-Jarboua  
25 was in continual contact with defendants and that defendant  
Brittany moore and her supervisor "Evans" and the James city  
26 county Williamsburg and Envoy of Williamsburg used the 3  
defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy  
27 McCallup) recommendations to treat and medicate and kill  
plaintiff Jerry Theodore McCallup Jr.

1 10. Defendants Negligence caused another death during the same  
2 time frame, same location, same gender, same age group and under  
3 the same staff. This indicates that Defendant Scarlett Huag is in  
4 the morbid business and not compliance business. Two deaths with  
5 in a week of each other obviously indicate Envoy of Williamsburg  
6 is into murder.  
7 11. All Defendants co-conspired to cause Plaintiffs death, even  
8 after plaintiff informed defendants he didn't take medications.  
9 12. All Defendants Reckless and wanton conduct caused Plaintiffs  
10 wrongful death. All plaintiff's medical conditions could be  
11 treated with diet. Patients with Identical conditions are treated  
12 with diet ALL OVER THE WORLD.  
13 13. Defendants of the Adult Protective Services division, abused  
14 power and co-conspired to cause plaintiff death with (the  
15 Cubans/Arabs Al-Jarboau's who are unauthorized persons violating  
16 HIPPA LAWS.  
17 14. This wrongful death complaint cause of action, civil complaint  
18 has caused a. sorrow, b. mental anguish, c. loss of companionship  
19 and d. business partnership.  
20 15. Plaintiff seeks Compensation for reasonably expected loss  
21 income from loss of business provided by the decedent.  
22 16. Plaintiff seeks Expenses for the care and treatment and  
23 hospitalization of the decedent resulting in death and return of  
24 all expenses paid for unauthorized treatments and  
25 hospitalization.  
26 17. Plaintiff seeks Funeral expenses and burial expenses because  
27 the cremation is in a bottle on the table. Plaintiff seeks  
Punitive Damages, Plaintiff seeks compensatory damages  
18. Dr. Veronica McCallup DSc is Plaintiff Administrator and  
Executor and is also Plaintiffs Beneficiary and Power of attorney  
and Medical Power of Attorney. However, was not ever contacted,  
called, emailed, found on facebook nor any other social media in  
violation of due process. And seek awards of all damages within  
this complaint.  
28 19. The state last inspection on this facility was July 2018 and  
no further check ups were made. The state found serious  
violations at that time, that were not ever corrected. The county  
should have been aware of these violations and should never have  
placed the plaintiff there, nor should Jerry Theodore McCallup  
Jr. have been placed in any hospital. His Doctor sister could  
have taken him home or to a better care facility.  
20. Nor should defendants send any person to these violating  
defendants for any care, hospice care or post care of any kind.  
The State should care about seniors and not conspire in senior  
abuse, elder abuse and violation to medicare medicade spending,  
medicade.

1 21. The Williamsburg Judge is included as a defendant because he  
2 knew all parties wasn't served/found/include. And the Judge  
3 defendant is the only Judge in town and when plaintiff attempted  
4 to file the wrongful death lawsuit in 2019, this Judge would  
5 return the documents without filing. Plaintiff went to Virginia  
6 and personally filed the lawsuit and the Judge refused to allow  
7 plaintiff to file the Lawsuit. Plaintiff a 3<sup>rd</sup> time filed the  
8 rejected lawsuit and the Judge refused to allow plaintiff to file  
9 the lawsuit and WOULDN'T tell plaintiff why after 3-4 times.  
10 22. Wherefore, causing plaintiffs damages, grief, undue stressors,  
11 emotional distress, fees, fines sabotaging plaintiffs statue of  
12 limitations, obstructing Justice. And plaintiff is entitled to  
13 damages demanded herein of \$3,000,000.00 PLUS Punitive damages  
14 and the courts have held that pro per litigants can receive  
attorney type fees for litigations/working, just like in probate  
matters; the administrator is paid for all hours worked on the  
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry  
Theodore McCallup JR Beneficiary and Power of attorney and  
medical Power of Attorney documented with the military and other  
courts in other states including Virginia. No court, no hospital,  
NO action concerning Plaintiff Jerry Theodore McCallup JR. can  
precede without Plaintiff Dr. Veronica McCallup DSc.  
14

15 **CLAIM XXXIX OBSTRUCTION OF EVIDENCE, DEPRIVING EVIDENCE,**

16 **DESTROYING EVIDENCE** Damage Demand \$5,000,000.00

17 Defendants: Williamsburg Department of Human Services social  
18 services Division, Scarlett Huang (compliance officer) Envoy of  
19 Williamsburg, Department of Human Services social services  
20 Division , Scarlett Huang (compliance officer) Envoy of  
21 Williamsburg, Wendy Evans Williamsburg human services, Brittany  
22 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
23 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup  
24 Jeremy McCallup Wife, Fahad Al-Jarboua , County of James city  
county

25 1. Plaintiff affirms all aforesaid and state:

26 2. Defendant Jeremy Mccallup hid Plaintiff Jerry Mccallup Jr in  
27 motels when Plaintiff had enough money to maintain the Virginia  
28 house and or the apartment at Merrimac crossing.

1       3. Defendant Jeremy McCallup and Deborah Al-Jarboua and Fahad  
2       Al-Jarboua wanted the plaintiff Jerry Theodore McCallup Jr  
3       money and told defendant Williamsburg Human services that  
4       Plaintiff Jerry Theodore McCallup JR was going to pay him  
5       \$1,500.00 a month. There was NO WAY Plaintiff Jerry Theodore  
6       McCallup JR was going to pay Defendant Jeremy McCallup  
7       \$1,500.00 before Defendant Jerry Theodore McCallup III. But  
8       Defendant Jeremy McCallup Had intentionally incapacitated  
9       plaintiff Jerry Theodore McCallup JR and blocked any and all  
10      abilities for Dr. Veronica McCallup DSc and defendant Jerry  
11      Theodore McCallup III from reaching Plaintiff Jerry Theodore  
12      McCallup JR.

13      4. Plaintiff has requested records and medical records  
14      treatments and hospitalizations from defendants since May 2019  
15      and defendants have refused Plaintiffs estate.

16      5. Plaintiff estate traveled to defendants in persons and  
17      defendants assure plaintiff that; the records would be  
18      collected and forwarded to plaintiff. However, defendant  
19      "Ciere" places plaintiff estate on indefinite holds on the  
20      phone and run-a-rounds, not connecting to defendant Brian  
21      Stevenson, who stood in the hall way looking and listening to  
22      plaintiffs estate and knew the request for records and  
23      documents, had been faxed and personally delivered, but, he  
24      continues to ignore plaintiffs, like he has ignore the ENVOY of  
25      Williamsburg and has the facility in major state violations.  
26      And like, he is part cause, of another death, of another man;  
27      at the ENVOY of Williamsburg VA for ignoring/negligence he is a  
28      responsible party in this death of this plaintiff.

29      6. Plaintiffs', Facebook messaged and actually wrote on  
30      defendants facebook page; requesting information about brothers  
31      death; and all defendants BLOCKED plaintiffs on all social  
32      media. Even Mikala McCallup Blocked Plaintiffs on all social  
33      media pages.

1       7. Plaintiffs contacted Fort Braggs Military base where  
2 defendant Fahad Al-Jarboua is a recruiting sergeant in North  
3 Carolina. Plaintiff explain that Plaintiff had died and that  
4 Defendant Fahad Al-Jarboua was coming to Envoy acting like the  
5 son and prescribing medication and approving medical treatments  
6 in uniform. This mis-leading act is illegal and actionable.  
7 Fort Briggs said they would reach out to the soldier and they  
8 did, defendant Fahad Al-Jarboua had someone call plaintiff from  
9 a north Carolina number. Plaintiff explained that "my brother  
10 died, I'm just finding out. can you tell me what happened. "and  
11 the party from North Carolina said : "you have the wrong  
12 number". Fort Braggs gave them my number after they looked up  
13 the soldier name rank serial number. It wasn't the wrong  
14 number. He's their soldier.

15       8. AS a Result of these defendants actions they Caused the  
16           Death of Jerry Theodore McCallup Jr. and injured plaintiffs,  
17           and thereby plaintiffs seek all the aforesaid damages.

18       9. Plaintiffs are also seeking court marshal of soldiers  
19           involved and imprisonment of drug administrators cops  
20           doctors nurses Deborah Al-jarboua and all others involve at  
21           social services "Evans and Britany Moore and the Judge  
22           removed from all cases/ retired.

23       10. Wherefore, causing plaintiffs damages, grief, undue  
24           stressors, emotional distress, fees, fines sabotaging  
25           plaintiffs statue of limitations, obstructing Justice. And  
26           plaintiff is entitled to damages demanded herein of  
27           \$3,000,000.00 PLUS Punitive damages and the courts have held  
28           that pro per litigants can receive attorney type fees for  
         litigations/working, just like in probate matters; the  
         administrator is paid for all hours worked on the  
         estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's  
         Jerry Theodore McCallup JR Beneficiary and Power of attorney  
         and medical Power of Attorney documented with the military  
         and other courts in other states including Virginia. No  
         court, no hospital, NO action concerning Plaintiff Jerry  
         Theodore McCallup JR. can precede without Plaintiff Dr.  
         Veronica McCallup DSc.

1  
2 **CLAIM XXXVI DEPRIVAL OF MEDICAL CARE.** 3 million dollars is  
3 DEMANDED .

4 Defendants: Williamsburg Department of Human Services social  
5 services Division Scarlett Huang (compliance officer), Envoy of  
6 Williamsburg, Department of Human Services social services  
7 Division , Scarlett Huang (compliance officer) Envoy of  
8 Williamsburg, Wendy Evans Williamsburg human services, Brittany  
9 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore  
10 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup  
11 Jeremy McCallup Wife, Fahad Al-Jarboua , James City County

12 1. Plaintiff re-affirms all the aforesaid herein and state:  
13 2. Plaintiff's sister is a doctor and the sister could have taken  
14 plaintiff with sister to be medically treated in another state.

15 Plaintiff is also Native Indian and there are 10 tribes in the  
16 surrounding Virginia area, with medicine men, but none was  
17 contacted. Plaintiff sister called all the tribes and spoke to  
18 the chiefs. It was obvious that Envoy of Williamsburg COULDN'T  
19 care for plaintiff and no-other person because one died in the  
20 same week of plaintiff and in September 2019 all patients were  
21 removed. Even after covid 19 onset and Envoy of williamsburg  
22 reopening, the defendants fail to give plaintiff due process and  
23 rights.

24 3. Many doctors prescribe rehab for patients. I've seen severe head  
25 injuries and paraplegic. Defendants offered no rehab, they  
26 offered no alternatives, they didn't even contact doctor  
27 relatives.

28 4. Wrongful Death due to a preventable medical error and the  
reckless/negligent behavior of defendants.

5. Wrongful death and Patient Rights

1 6. Time after time after time the medical staff failed to properly  
2 obtain medical care out side of Virginia and give Plaintiff Jerry  
3 Theodore McCallup Jr, the best care.

4 7. Callous indifference to Native Americans.

5 On or about February and April and May of 2020 Plaintiff  
6 personally walked into Envoy of Williamsburg and requested  
7 records and documents. This is September 7, 2020 and Plaintiff  
8 hasn't received them to date. I declare under penalty of  
9 perjury this is true and correct.

10 8. Plaintiff Jerry Theodore McCallup Jr repeatedly requested  
11 sister, Dr. Veronica McCallup DSc and defendants refused to  
12 locate plaintiff. (Beneficiary, Power of Attorney, Medical Power  
13 of Attorney). He would have moved in with his sister.

14 9. Plaintiffs are Native American Indians who have been to college  
15 and Universities exceeding associate degrees in Science  
16 Technology and Medicine. Plaintiffs had a business together that  
17 they ran from Detroit Michigan. Chicago, IL, California, and  
18 Texas. Plaintiff CTI Chemicals and Allied Products, Inc. The  
19 killing, poisoning, hindering, blocking of plaintiffs contact  
20 with sister and business, obstruction, Interference was malicious  
21 and intentional, willful and wonton.

22 10. Defendants Never had Jurisdiction to place plaintiff under  
23 ADULT PROTECTIVE SERVICES, and defendants never gave notice to  
24 all the family and plaintiffs; that there was court hearings or  
25 to any court hearing or court action. to place plaintiff under  
protective services was unlawful and done by NON\_FAMILY MEMBERS  
in co-conspiracy with Williamsburg social services and defendant  
Britany Moore. under these deprival of rights and lack of due  
process; plaintiff died and defendants basically KIDNAPPED  
plaintiff and forced death upon Plaintiff. The (Al-Jarboua's are  
NOT family members. The Cubans and Arabs are NOT family members,  
they pretended to be plaintiff "wife" (x-wife, plaintiff WASN'T  
married) and plaintiff son in Colorado (plaintiff son in Colorado  
wasn't in Virginia)). Jeremy McCallup was a married man and  
caused Jerry Theodore McCallup Jr williamsbug house to go into  
foreclosure by deception. (the bills were paid, everything was  
taken care of,...) Plaintiff Jerry Theodore McCallup Jr had a  
monthly income of \$3,400.00-\$4,900.00 and had 20 years of equity  
in the house. Theres no reason to lose the home except Defendant  
Jeremy McCallup , Fahad Al-jarboua and Deborah Al-jarboua scheme.  
Defendant Jeremy McCallup was 20- 22 years old and had gotten  
married and wanted the house.

1 11. Defendants were discriminating against Plaintiff and forcing  
2 death upon plaintiff; because of his race, creed, nationality and  
3 culture. On plaintiff birth certificate and death certificate it  
documents that plaintiff is a native American, an Indian.  
Plaintiff health could be treated with diet.  
4 12. Plaintiffs recently learned that defendants used and allowed  
5 defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy  
6 McCallup to pretend to be and to steal the identity of and  
7 aggravated identity theft, of: plaintiffs: 1. X-wife 2. plaintiff  
son; in order, to locate plaintiff money, insurance policies and  
property.  
8 13. Plaintiff learned that defendants wanted the plaintiff Jerry  
Theodore McCallup Jr dead/to die; to collect his money, bank  
9 accounts, insurances, and property and to ensure death, they  
blocked tricked, would not contact, plaintiff Jerry Theodore  
10 McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a  
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11 until plaintiff met the Cubans/arabs (al-jarboua's).  
12 14. Hospital records and social service records and State records  
and court records DOCUMENT; that, defendant Deborah S. Al-Jarboua  
13 was in continual contact with defendants and that defendant  
Brittany moore and her supervisor "Evans" and the James city  
14 county Williamsburg and Envoy of Williamsburg used the 3  
15 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy  
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16 plaintiff Jerry Theodore McCallup Jr.  
17 15. Defendants Negligence caused another death during the same  
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the same staff. This indicates that Defendant Scarlett Huag is in  
18 the morbid business and not compliance business. Two deaths with  
19 in a week of each other obviously indicate Envoy of Williamsburg  
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20 16. All Defendants co-conspired to cause Plaintiffs death, even  
after plaintiff informed defendants he didn't take medications.  
21 17. All Defendants Reckless and wanton conduct caused Plaintiffs  
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treated with diet. Patients with Identical conditions are treated  
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23 18. Defendants of the Adult Protective Services division, abused  
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24 Cubans/Arabs Al-Jarboau's who are unauthorized persons violating  
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has caused a. sorrow, b. mental anguish, c. loss of companionship  
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26 19. Plaintiff seeks Compensation for reasonably expected loss  
income from loss of business provided by the decedent.

1 20. Plaintiff seeks Expenses for the care and treatment and  
2 hospitalization of the decedent resulting in death and return of  
3 all expenses paid for unauthorized treatments and  
4 hospitalization.

5 21. Plaintiff seeks Funeral expenses and burial expenses because  
6 the cremation is in a bottle on the table.

7 10. Plaintiff seeks Punitive Damages

8 11. Plaintiff seeks compensatory damages

9 12. Dr. Veronica McCallup DSc is Plaintiff Administrator  
10 and Executor and is also Plaintiffs Beneficiary and Power of  
11 attorney and Medical Power of Attorney. However, was not  
12 ever contacted, called, emailed, found on facebook nor any  
13 other social media in violation of due process. And seek  
14 awards of all damages within this complaint.

15 13. The state last inspection on this facility was July  
16 2018 and no further check ups were made. The state found  
17 serious violations at that time, that were not ever  
18 corrected. The county should have been aware of these  
19 violations and should never have placed the plaintiff there,  
20 nor should Jerry Theodore McCallup Jr. have been placed in  
21 any hospital. His Doctor sister could have taken him home or  
22 to a better care facility.

23 14. Nor should defendants send any person to these  
24 violating defendants for any care, hospice care or post care  
25 of any kind. The State should care about seniors and not  
26 conspire in senior abuse, elder abuse and violation to  
27 medicare medicade spending, medicade.

28 15. The Williamsburg Judge is included as a defendant  
16 because he knew all parties wasn't served/found/include.  
17 And the Judge defendant is the only Judge in town and when  
18 plaintiff attempted to file the wrongful death lawsuit in  
19 2019, this Judge would return the documents without filing.  
20 Plaintiff went to Virginia and personally filed the lawsuit  
21 and the Judge refused to allow plaintiff to file the  
22 Lawsuit. Plaintiff a 3<sup>rd</sup> time filed the rejected lawsuit and  
23 the Judge refused to allow plaintiff to file the lawsuit and  
24 WOULDN'T tell plaintiff why after 3-4 times.

25 **CLAIM XXXX Wrongful Death due to a preventable medical error and**  
26 **the reckless/negligent behavior of defendants. DEMAND**

27 \$3,000,000.00 MILLION DOLLARS

28 2. Wrongful death and Patient Rights

1       3. Time after time after time the medical staff failed to properly  
2 obtain medical care out side of Virginia and give Plaintiff Jerry  
3 Theodore McCallup Jr, the best care.

4       4. Callous indifference to Native Americans.

5       16.       5. Plaintiff Jerry Theodore McCallup Jr repeatedly  
6            requested sister, Dr. Veronica McCallup DSc and defendants  
7            refused to locate plaintiff. (Beneficiary, Power of  
8            Attorney, Medical Power of Attorney). He would have moved in  
9            with his sister.

10       17.       Plaintiffs are Native American Indians who have been to  
11            college and Universities exceeding associate degrees in  
12            Science Technology and Medicine. Plaintiffs had a business  
13            together that they ran from Detroit Michigan. Chicago, IL,  
14            California, and Texas. Plaintiff CTI Chemicals and Allied  
15            Products, Inc. The killing, poisoning, hindering, blocking  
16            of plaintiffs contact with sister and business, obstruction,  
17            Interference was malicious and intentional, willful and  
18            wanton.

19       18.       Defendants Never had Jurisdiction to place plaintiff  
20            under ADULT PROTECTIVE SERVICES, and defendants never gave  
21            notice to all the family and plaintiffs; that there was  
22            court hearings or to any court hearing or court action. to  
23            place plaintiff under protective services was unlawful and  
24            done by NON\_FAMILY MEMBERS in co-conspiracy with  
25            Williamsburg social services and defendant Britany Moore.  
26            under these deprival of rights and lack of due process;  
27            plaintiff died and defendants basically KIDNAPPED plaintiff  
28            and forced death upon Plaintiff. The (Al-Jarboua's are NOT  
          family members. The Cubans and Arabs are NOT family members,  
          they pretended to be plaintiff "wife" (x-wife, plaintiff  
          WASN'T married) and plaintiff son in Colorado (plaintiff son  
          in Colorado wasn't in Virginia)). Jeremy McCallup was a  
          married man and caused Jerry Theodore McCallup Jr  
          williamsbug house to go into forclosure by deception. (the  
          bills were paid, everything was taken care of,...) Plaintiff  
          Jerry Theodore McCallup Jr had a monthly income of  
          \$3,400.00-\$4,900.00 and had 20 years of equity in the house.  
          Theres no reason to lose the home except Defendant Jeremy  
          McCallup , Fahad Al-jarboua and Deborah Al-jarboua scheme.  
          Defendant Jeremy McCallup was 20- 22 years old and had  
          gotten married and wanted the house.

20       19.       Defendants were discriminating against Plaintiff and  
21            forcing death upon plaintiff; because of his race, creed,  
22            nationality and culture. On plaintiff birth certificate and  
23            death certificate it documents that plaintiff is a native

1           American, an Indian. Plaintiff health could be treated with  
2           diet.

3       20.      Plaintiffs recently learned that defendants used and  
4           allowed defendants Deborah Al- Jarboua, Fahad Al-Jarboua and  
5           Jeremy McCallup to pretend to be and to steal the identity  
6           of and aggravated identity theft, of: plaintiffs: 1. X-wife  
7           2. plaintiff son; in order, to locate plaintiff money,  
8           insurance policies and property.

9       21.      Plaintiff learned that defendants wanted the plaintiff  
10           Jerry Theodore McCallup Jr dead/to die; to collect his  
11           money, bank accounts, insurances, and property and to ensure  
12           death, they blocked tricked, would not contact, plaintiff  
13           Jerry Theodore McCallup Jr. sis, Dr. Veronica Renee McCallup  
14           DSc who is a medical doctor and who has been treating  
15           plaintiff holistically until plaintiff met the Cubans/arabs  
16           (al-jarboua's).

17       22.      Hospital records and social service records and State  
18           records and court records DOCUMENT; that, defendant Deborah  
19           S. Al-Jarboua was in continual contact with defendants and  
20           that defendant Brittany moore and her supervisor "Evans" and  
21           the James city county Williamsburg and Envoy of Williamsburg  
22           used the 3 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua,  
23           Jeremy McCallup) recommendations to treat and medicate and  
24           kill plaintiff Jerry Theodore McCallup Jr.

25       23.      Defendants Negligence caused another death during the  
26           same time frame, same location, same gender, same age group  
27           and under the same staff. This indicates that Defendant  
28           Scarlett Huag is in the morbid business and not compliance  
          business. Two deaths with in a week of each other obviously  
          indicate Envoy of Williamsburg is into murder.

29       24.      All Defendants co-conspired to cause Plaintiffs death,  
30           even after plaintiff informed defendants he didn't take  
31           medications.

32       25.      All Defendants Reckless and wanton conduct caused  
33           Plaintiffs wrongful death. All plaintiff's medical  
34           conditions could be treated with diet. Patients with  
35           Identical conditions are treated with diet ALL OVER THE  
36           WORLD.

37       26.      Defendants of the Adult Protective Services division,  
38           abused power and co-conspired to cause plaintiff death with  
39           (the Cubans/Arabs Al-Jarboau's who are unauthorized persons  
40           violating HIPPA LAWS.

41       27.      This wrongful death complaint cause of action, civil  
42           complaint has caused a. sorrow, b. mental anguish, c. loss  
43           of companionship and d. business partnership.

44       28.      Plaintiff seeks Compensation for reasonably expected  
45           loss income from loss of business provided by the decedent.

1       29. Plaintiff seeks Expenses for the care and treatment and  
2       hospitalization of the decedent resulting in death and  
3       return of all expenses paid for unauthorized treatments and  
4       hospitalization.

5       30. Plaintiff seeks Funeral expenses and burial expenses  
6       because the cremation is in a bottle on the table.

7       31. Plaintiff seeks Punitive Damages

8       32. Plaintiff seeks compensatory damages

9       33. Dr. Veronica McCallup DSc is Plaintiff Administrator  
10      and Executor and is also Plaintiffs Beneficiary and Power of  
11      attorney and Medical Power of Attorney. However, was not  
12      ever contacted, called, emailed, found on facebook nor any  
13      other social media in violation of due process. And seek  
14      awards of all damages within this complaint.

15      34. The state last inspection on this facility was July  
16      2018 and no further check ups were made. The state found  
17      serious violations at that time, that were not ever  
18      corrected. The county should have been aware of these  
19      violations and should never have placed the plaintiff there,  
20      nor should Jerry Theodore McCallup Jr. have been placed in  
21      any hospital. His Doctor sister could have taken him home or  
22      to a better care facility.

23      35. Nor should defendants send any person to these  
24      violating defendants for any care, hospice care or post care  
25      of any kind. The State should care about seniors and not  
26      conspire in senior abuse, elder abuse and violation to  
27      medicare medicade spending, medicade.

28      36. The Williamsburg Judge is included as a defendant  
29      because he knew all parties wasn't served/found/include.  
30      And the Judge defendant is the only Judge in town and when  
31      plaintiff attempted to file the wrongful death lawsuit in  
32      2019, this Judge would return the documents without filing.  
33      Plaintiff went to Virginia and personally filed the lawsuit  
34      and the Judge refused to allow plaintiff to file the  
35      Lawsuit. Plaintiff a 3<sup>rd</sup> time filed the rejected lawsuit and  
36      the Judge refused to allow plaintiff to file the lawsuit and  
37      WOULDN'T tell plaintiff why after 3-4 times.

38      37. Wherefore, causing plaintiffs damages, grief, undue  
39      stressors, emotional distress, fees, fines sabotaging  
40      plaintiffs statue of limitations, obstructing Justice. And  
41      plaintiff is entitled to damages demanded herein of  
42      \$3,000,000.00 PLUS Punitive damages and the courts have held  
43      that pro per litigants can receive attorney type fees for  
44      litigations/working, just like in probate matters; the  
45      administrator is paid for all hours worked on the  
46      estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's

1 Jerry Theodore McCallup JR Beneficiary and Power of attorney  
2 and medical Power of Attorney documented with the military  
3 and other courts in other states including Virginia. No  
4 court, no hospital, NO action concerning Plaintiff Jerry  
Theodore McCallup JR. can precede without Plaintiff Dr.  
5 Veronica McCallup DSc.

38.

6 **IV. Relief 80.1 million dollars plus funeral expenses burial and**  
**travel**

7 State briefly and precisely what damages or other relief the  
plaintiff asks the court to order. Do not make legal arguments.  
8 Include any basis for claiming that the wrongs alleged are  
9 continuing at the present time. Include the amounts of any actual  
10 damages claimed for the acts alleged and the basis for these  
11 amounts. Include any punitive or exemplary damages claimed, the  
12 amounts, and the reasons you claim you are entitled to actual or  
Punitive money damages. Plaintiff demands all property of Jerry  
Theodore McCallup JR cars homes land bank accounts credit unions  
and all stated and alluded to herein.

13

14

15

Respectfully submitted

16 Dr. Veronica McCallup DSc

17 Plaintiff In Propria persona

18

19

I declare under Penalty of Perjury That ALL herein this COMPLAINT  
is to best of my ability and true and correct, this the September  
20 7<sup>st</sup>, 2020

21

Sincerely,

22

Dr. Veronica McCallup DSc

23

Plaintiff In Pro per

24

**Certification and Closing**

25

Under Federal Rule of Civil Procedure 11, by signing below, I  
certify to the best of my knowledge, information, and belief that  
this complaint: (1) is not being presented for an improper  
purpose, such as to harass, cause unnecessary delay, or  
needlessly increase the cost of litigation; (2) is supported by  
existing law or by a nonfrivolous argument for extending,  
modifying, or reversing existing law; (3) the factual contentions  
have evidentiary support or, if specifically so identified, will

1 likely have evidentiary support after a reasonable opportunity  
2 for further investigation or discovery; and (4) the complaint  
3 otherwise complies with the requirements of Rule 11.

4 **A. For Parties Without an Attorney**

5 I agree to provide the Clerk's Office with any changes to my  
6 address where case-related papers may be served. I understand  
7 that my failure to keep a current address on file with the  
8 Clerk's Office may result in the dismissal of my case.

9 Date of signing: September 7, 2020

10 Signature of Plaintiff

11 Printed Name of Plaintiff: Dr. Veronica McCallup DSc

12 **For Attorneys**

13 Date of signing: September 7, 20120

14 Signature of Attorney:

15 Printed Name of Attorney: Dr. Veronica McCallup DSc

16 Bar Number: Pro Pro

17 Name of Law Firm: Estate of Jerry Theodore McCallup Jr

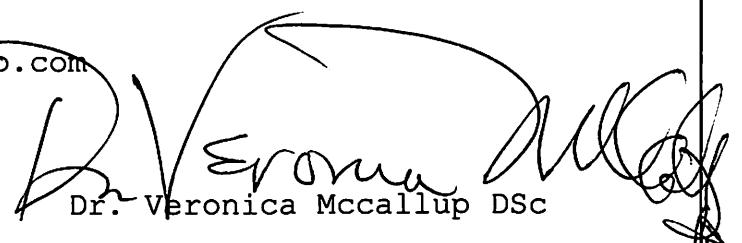
18 Street Address: 1042 N. Mountain Ave

19 State and Zip Code: California 91786

20 Telephone Number: 504-405-6513

21 E-mail Address: vmccallup@yahoo.com

22 Respectfully submitted



Dr. Veronica McCallup DSc

23 Plaintiff In Propria persona

24 CERTIFICATE OF SERVICE

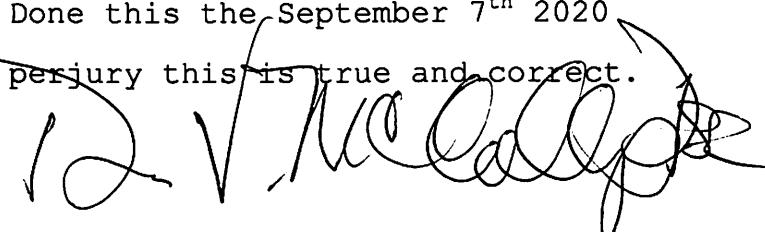
25 I, Dr. Veronica McCallup DSc have served all parties at last  
26 known addresses and electronically where possible. All  
27 Governments waive service. Done this the September 7<sup>th</sup> 2020

28 I declare under penalty of perjury this is true and correct.

29 Sincerely,

30 Dr. veronica McCallup DSc

31 Plaintiff In Propria Persona



Dr. Veronica McCallup DSc